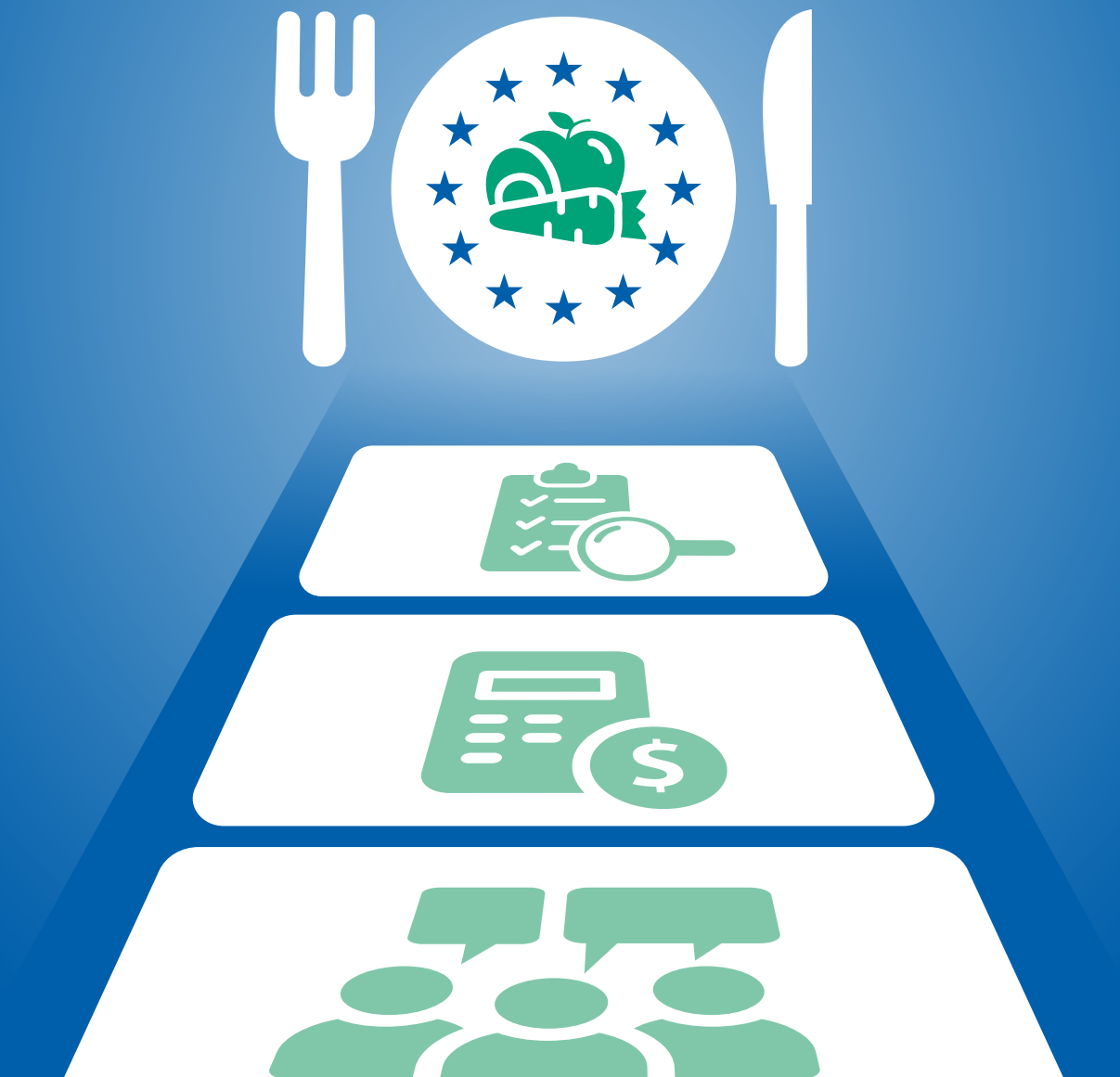
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# Paving the Way to Good Food for All

## POLICY PATHWAYS FOR THE REALIZATION OF THE RIGHT TO FOOD IN EUROPE



**The right to food shall be a guiding principle for regional, national, and European food policies and governance.** Therefore, political decision makers in Europe should:

- introduce the right to food in regional, national, and European legal frameworks, policies and programs, in line with the countries' binding obligations as States Parties of the International Covenant on Economic, Social and Cultural Rights (ICESCR);
- ensure policy coherence with the right to food;
- develop an EU-specific regulation on sustainable and fair food systems built on the right to food as well as integrate the right to food as a pillar within the EU Multiannual Financial Framework (MFF) 2028-2034.

To illustrate the practical implications, this policy brief provides examples from four key areas: food poverty, democratization of food policy, right-to-food budgeting, and transparent supply chains.

### Overcoming Food Poverty

Food poverty is a key indicator that the right to food has not yet been fully realized in Europe. It shows that people with low income struggle to access healthy, sustainably produced food. To eradicate food poverty, political decision makers should:

- improve social protection frameworks — specifically, the adequacy of minimum income schemes — and develop an EU directive on adequate minimum income outlining minimum standards for coverage, accessibility, and adequacy;
- promote food as a public good by supporting and building public food infrastructure, such as public restaurants and public supermarkets;
- promote and further explore food social security at local and national level, with the aim that everyone, especially marginalized people, is provided with a monthly budget for purchasing healthy, sustainably produced food, supported by local participation in food policy.

### Promoting the Democratization of Food Policy

Food is a critical area in which politics can overcome people's alienation from democracy and rebuild trust through active civic engagement. Political decision makers in Europe should play a leading role in strengthening democracy by actively involving the public in food policy decisions, and specifically support:

- the creation and strengthening of municipal and national food councils, as well as the proposal to establish a European Food Policy Council, as suggested by the European Economic and Social Committee;
- the participatory development of local, regional, or national food policies, connecting urban and peri-urban food systems and fostering intercultural exchange;
- effectively integrating rights-holder groups most affected by food insecurity and inequalities, including small-scale food producers, in these inclusive food governance mechanisms at the local, national and European level.

### Budgeting for the Right to Food

Budgeting for the right to food is a precondition for realizing it. Political decision makers in Europe, particularly parliamentarians, should support a human rights-based approach to budgeting, especially in relation to the right to food. They should specifically:

- develop national right-to-food action plans through a participatory process that identifies priority needs, particularly of marginalized groups, sets specific policy targets, and links these targets to budget lines;
- establish participatory monitoring procedures and apply specific budget analyses at the national and European level to assess budget allocations, actual expenditure, and specific impacts on the right to food, suggesting corrective action wherever needed.

### Ensuring Transparent Supply Chains

One key way of protecting the right to food beyond Europe's borders is to ensure traceable, transparent food supply chains that make it possible to monitor whether European companies are meeting their human rights and environmental due diligence obligations. Political decision makers should:

- develop new or strengthen existing national and EU human rights and environmental due-diligence regulations, and include mandatory traceability and transparency requirements and standards that enable affected communities, labor unions, civil society organizations, and enforcement authorities to monitor compliance and hold companies accountable;
- ensure that traceability and transparency requirements and standards are designed with the primary aim of protecting the rights of the most marginalized communities in food supply chains, especially workers and small-scale producers;
- develop and invest in accessible tools and methods for ensuring traceability in high-risk food supply chains, prioritizing the needs and capacity of small-scale producers.

# Paving the Way to Good Food for All

## POLICY PATHWAYS FOR THE REALIZATION OF THE RIGHT TO FOOD IN EUROPE

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# Introduction

On October 3, 2024, the Parliamentary Assembly of the Council of Europe passed a historic resolution on "Guaranteeing the human right to food". The resolution starts by acknowledging the "extremely paradoxical phenomenon on the European continent as regards access to food: hunger and malnutrition are still present even though there are ample supplies of foodstuffs." The resolution calls on member states to "explicitly include the right to food in their constitutional provisions" and to "adopt national framework laws covering the right to food."[1]

In line with this, the European Citizens' Initiative "Food is a Human Right for All!" demands that the EU systemically guarantees the right to food and promotes healthy, just, humane, and sustainable food systems for present and future generations, integrating the right to food into all EU legal frameworks that affect it, both within the EU and abroad.[2]

This publication builds on the Parliamentary Assembly resolution and the European Citizens' Initiative with the aim of promoting the right to food as a guiding principle for local, national, and regional food policies and governance in Europe.

Specifically, this paper provides examples of how a human rights-based approach can be applied to food-related policies in four key areas:

- overcoming food poverty;
- the democratization of food policy;
- the right to food in public budgeting; and
- supply chain traceability and transparency.

These four areas are priority topics for the two publishing organizations. They are also central to realizing the right to food and illustrate how wide-ranging its implications are.

A human rights-based approach focuses on the perspective of rights-holders and states' obligations to respect, protect, and fulfill their right to food. Human rights require the participation of rights-holders in policymaking, especially those who have been sidelined and excluded. A human rights-based approach addresses the immediate drivers and systemic causes of food insecurity and is guided by the FAO principles on the right to food: Participation, Accountability, Non-Discrimination, Transparency, Human Dignity, Empowerment, and the Rule of Law.[3]

Policy coherence with the right to food and accountability of duty bearers can be put into practice through democratic processes at the municipal, national and European level. This publication shares reflections, experiences, initiatives, and recommendations that are critical for better protecting and promoting the human right to adequate food in Europe.

# Chapter 1: **Overcoming Food Poverty**

Food poverty is a dimension of poverty that captures how low income affects a person's ability to access adequate food.[4] It's important to emphasize that food poverty is not about the ability to purchase any food, but rather the ability to access adequate food, that is *healthy, nutritious, sustainably produced and culturally appropriate*.[5] In Europe, poor households are usually (but not always) able to afford food that covers their needs in caloric terms, but they often struggle to afford healthy, varied diets: To achieve the same energy intake, consumers need to spend much more money on fruit and vegetables than on foods that are poor in nutrients but rich in fats, sugar, and starch.[6] Focusing solely on people's access to sources of protein, Eurostat has found that more than 38 million people in the EU are unable "to afford a meal with meat, chicken, fish (or vegetarian equivalent) every second day."[7]

Crucially, food poverty severely impacts a person's quality of life and life expectancy. The Global Burden of Disease study estimates that "in the European Union in 2019, over 800,000 deaths [were] attributable to dietary risks due to unhealthy diets."[8] Furthermore, food poverty affects marginalized communities disproportionately, as expressed in the concept of food (in)justice. For instance, people with disabilities are more likely to lack access to adequate food[9] than the general population, as are migrant and refugee communities,[10] women, and older people.[11] Similarly, a survey found that Black households in the UK are at a considerably higher risk of food poverty than white households.[12]

## Existing policy practices and initiatives

### Fighting Food Poverty by Eradicating Poverty: Social Protection and Minimum Income

Some of the most powerful tools for guaranteeing people's access to adequate food are social protection frameworks and programs that successfully lift people out of poverty.[13] While the overall current political framework fails to achieve this, there are existing practices that can be built on as part of a wider strategy for the progressive eradication of food poverty in Europe.

At the EU level, the European Pillar of Social Rights is a non-binding set of principles and rights that, among other things, is intended to ensure that everyone in Europe can benefit from social protection and inclusion.[14] At the national level, one of the key tools for eradicating poverty is minimum income schemes, as promoted in Principle 14 of the European Pillar of Social Rights. Minimum income schemes encompass benefits that support people who are unable to work, cannot find a job, or whose income is too low to lead a dignified life. These schemes should be designed in a way that offers people a route out of poverty. While all EU Member States offer some form of minimum income, the adequacy of these schemes varies widely — a problem that efforts at EU-level,

*Field Note 1.1:*
**Reference Budgets and the Calculation of Food Baskets**

The European Anti-Poverty Network considers reference budgets reflecting the cost of living in a specific country to be the most desirable method of calculating minimum income benefits.[15] "Reference budgets are baskets of goods and services that are considered necessary to reach an acceptable standard of living for an individual household within a given country, region or city."[16] One important element of reference budgets is food baskets: these calculate the cost of a healthy diet in line with country-specific dietary guidelines.[17] Although the European Commission has been funding the European Reference Budgets Network with the objective of establishing a common reference budget methodology, an EU-wide framework for setting reference budgets has not yet been established.[18] Without this, the adequacy of reference budgets cannot be ensured across the EU. For this reason, the European Anti-Poverty Network has made it a key demand to integrate the public into the development of reference budgets, including the voices of people experiencing poverty.[19]

such as the Council Recommendation on adequate minimum income ensuring active inclusion, have not yet been able to resolve.[20] The first assessment of progress on implementing the Council Recommendation found that no EU country offers minimum income benefits that lift the income of a household above the at-risk-of-poverty threshold set by the EU.[21] Nevertheless, some countries are performing better than others. The European Commission finds that, depending on household category, the minimum income levels in Ireland, the Netherlands, Denmark, and Lithuania come closest to reaching the at-risk-of-poverty threshold.[22] In addition to how close benefits come to the threshold, other factors used in determining the quality of minimum income benefits include methodologies for calculation (*Field Note 1.1*), automatic inflation updates (indexation), and accessibility.[23]

In some cases, municipalities step in to complement minimum income schemes. The Netherlands is one example, where municipalities offer additional support to residents falling below income thresholds defined by the municipalities themselves. These thresholds are often set higher (up to 150%) than the nationally defined minimum income[24] (*Field Note 1.2*). Despite not focusing on access to adequate, healthy food, supplementary municipal income support schemes like these have the potential to provide the necessary additional funds for people to access healthy, adequate food — without forcing them to compromise on other aspects of leading a dignified life. Indeed, it's important to look beyond the amount of money allocated for food expenses in the calculation of minimum income benefits, and also examine "the cost of other essential goods and services."[25] If these costs are too high, recipients are forced to prioritize some essential needs over others. As essential costs like rent or electricity are fixed and difficult to change, people cut back on flexible expenses like food as the first thing.[26]

## Making Food a Public Good: Decommodifying Food through Public Restaurants and Supermarkets

Food is more than a commodity — it's something that is indispensable for life. In line with this view, several past and present policy practices and initiatives have contributed to the realization of the right to food in Europe by treating food as a public good, just like water, health care, and education. The most notable examples are public procurement, school meal initiatives, and public restaurants. While the former two are well known, less attention has generally been paid to the latter.

Public restaurants are eateries that are open to everyone and offer high-quality yet affordable meals thanks to public support.[27] Just like other public infrastructure, public restaurants generate positive societal effects beyond serving people on low incomes: offering affordable, healthy, and sustainable food can improve public health, enhance the ecological sustainability of a country's food system, strengthen the local food economy, and contribute to the creation of lively urban neighborhoods.[28] Public restaurants have a long tradition in some European countries. Unfortunately, their role in providing affordable food has been largely replaced by the fast-food industry, leading to considerable negative public health impacts. However, initiatives for public restaurants are slowly reviving this old concept. In Europe, Poland is currently the only country to run a nationally regulated and funded public restaurant scheme.

*Field Note 1.2:*
**Minimum Income Support by Municipalities**[29]

**Example:** "*Maatschappelijk Meedoen Budget*" (MMB; "Budget for participating in society"), Municipality of Wageningen, the Netherlands, running since 2025

**How it works:** Every adult resident of the municipality who is unable to participate fully in society due to their financial situation has the right to request financial support from the municipality (condition: assets of less than €8,000 per household). All MMB applicants attend an advisory appointment, during which the monthly costs of the applicant are calculated and deducted from their monthly income. If their remaining monthly budget is too low to enable their participation in social life, the applicant receives supplementary benefits to bring them up to the threshold. This "social participation threshold" is defined based on calculations by the Dutch National Institute for Family Finance Information.

**How it is funded:** Previously existing funds were combined into one simplified fund (MMB).

*Field Note 1.3:*
**Reviving Public Restaurants in Europe**[30]

**Example:** *Bary mleczne* (milk bars) in Poland

**How it works:** At their peak, Poland had some 40,000 milk bars. Nowadays, Poland has 150. These are run by private operators that receive public subsidies. They serve nutritious, affordable Polish cuisine and are a popular institution across socioeconomic groups.

**How it is funded:** The government provides approximately €14 million in subsidies to milk bars. The support scheme is regulated at the national and regional level, with local governments providing additional support for the milk bars' day-to-day business, including by occasionally waiving rent or electricity charges. Support is offered in the form of ingredient-specific subsidies, set at 70% of their respective costs. Milk bar operators must cap their markup (the profit margin). As the subsidized ingredients are generally staple vegetarian foods (vegetables, dairy, grain, and legumes) and meat is not usually subsidized, milk bars tend to offer healthy, ecologically sustainable meals.

**Similar initiatives:** UK (Nottingham, Dundee), Germany (Berlin), Türkiye (e.g. Istanbul, Ankara, Izmir, Antalya), the Netherlands (Rotterdam). Most of these are currently in the trial stage. In Türkiye, public restaurants have successfully spread and are run by municipal governments.

It goes without saying that a comprehensive vision of food as a public good does not end with public procurement initiatives and public restaurants. The Dutch initiative "Public Food", for instance, also proposes public supermarkets, which are emerging in several US cities.[31]

## Food Social Security: Social Insurance for Healthy and Sustainable Food

As a society, why do we agree that it is our responsibility to collectively cover the costs of health care based on solidarity, yet we consider access to adequate food — a vital prerequisite for health — a personal matter? What if we applied the principle of social security to food? In several European countries, there is a growing movement promoting food social security ("*sécurité sociale de l'alimentation*", SSA) that is calling for just that.

The vision, as promoted by the French SSA collective, involves a universal monthly allowance (accessible to everyone, irrespective of socioeconomic status) — proposed at € 150 in France — that residents can spend on specific (healthy, sustainably produced) foods at certain stores or markets that have been democratically agreed on.[32] Food social security entails a vision for democratizing food policy: by collectively deciding on the types of products and outlets that people can spend their monthly allowance on, residents not only gain equitable access to healthy food, but can also help shape their local food system. SSA therefore holds great potential for supporting regional, agroecological value chains, small-scale farmers, and artisanal food producers.

Currently, food social security is being trialed in the form of local community food funds[33] (*Field Note 1.4*). Ultimately, the movement aims to establish a national scheme, with different financing options under consideration. FIAN Belgium suggests combining income-based public contributions with state funding, raised through targeted taxes on agrifood corporations or increased excise taxes on unhealthy foods.[34] Moreover, some of the public spending might also be offset by savings in public health costs.[35]

As a first step toward implementing food social security beyond the local level, in 2024, 60 French parliamentarians introduced a bill for national-level trials with the aim of establishing food social security in France. Thus far, the bill has not passed in the National Assembly.[36] Nevertheless, this level of attention at the national policy level shows that the concept is gaining traction: in 2026, the regional parliament of Brussels, Belgium, adopted a resolution "for the establishment of an integrated policy strengthening the universal right to food and promoting the application of the Social Security for Food model", making Brussels the first regional parliament in Europe to formally recognize the food social security concept.[37] The resolution calls on the federal government "to examine the feasibility of a social security system for food" and to "identify, inventory and analyze the different trials relating to food social security conducted to date in Belgium."[38]

*Field Note 1.4:*
**Community Food Funds — Piloting Food Social Security at the Local Level**[39]

**Example:** *Caisse alimentaire commune* ("community food fund"), Montpellier, France, running since 2023

**How it works:** The 566 members of the community fund make a monthly financial contribution based on their means. In return, and irrespective of their contribution, all members receive a monthly budget of €100 that they can spend on healthy, high-quality food at 45 local shops and markets that are democratically selected by a "citizens' food committee" of 61 residents, half of whom are experiencing poverty.

**How it is funded:** The fund also receives public and private subsidies on top of the contributions made by the members, which make up around 50% of the fund's budget.

**Similar initiatives** (running or under development): France (Lyon, Toulouse, Gironde, among others — the map of the French SSA collective shows more than 40 initiatives), Switzerland (Geneva, Lausanne), Belgium (Brussels).

## Recommendations

**Political decision makers should:**

**1. Improve minimum income schemes in EU Member States by applying a human rights-based approach, specifically taking into account the human right to food.**

- In line with the recommendations published by the European Anti-Poverty Network[40], minimum income schemes should be "set above the at-risk-of-poverty threshold, grounded in reference budgets that reflect the true cost of living."[41] These reference budgets should be developed "in collaboration with individuals experiencing poverty."[42] Food expenses should be calculated using the actual costs of an adequate, healthy diet in line with dietary guidelines.

- To support this process at the EU level, "an EU Directive on Minimum Income with minimum standards for coverage, accessibility, adequacy, enabling characteristics, and automatic adjustments to reflect living costs"[43] should be developed and the 2028—2034 Multiannual Financial Framework should be used to improve minimum income schemes across all EU Member States.[44]

**2. Build public food infrastructure informed by existing practices and proposals for public restaurants and public supermarkets.**[45]

- Local governments should promote and support the establishment, day-to-day operations and replication of public restaurants as well as public supermarkets in their municipalities, both technically and financially.[46]

- Federal states and/or national governments should develop legislation that anchors public restaurants and public supermarkets as mechanisms for realizing the human right to food. This should entail the development of financially backed action plans.[47]

**3. Promote existing food social security initiatives and explore their implementation at the national level.**

- Municipal governments should learn from the experiences of community food funds across Europe, provide financial, and technical support to existing local initiatives for community food funds and/or design new projects in their regions.

- Federal, regional or national governments should develop legislation supporting the exploration and implementation of food social security at the national and municipal level.

- To support this process, the European Commission should "[p]ropose a directive aimed at supporting national social protection initiatives, in particular regarding social security for food."[48]

# Chapter 2:
# **Democratization of Food Policy**



Why is public participation critical for food policy? Worldwide, food insecurity and poverty are strongly linked to social exclusion, economic inequality, and political marginalization. This makes it vital that public participation is anchored in the policy response, specifically including those who have been historically excluded. A human rights-based approach places the perspective of these rights-holders center stage.[49] Recognizing affected communities and their rights and ensuring they are meaningfully represented where political decisions are made, are preconditions for redistributive policies that can help overcome the structural causes of food insecurity.[50]

Food is an essential element of daily life. When people feel that food policy is disconnected from their lived experiences and needs, trust in political processes declines. Public participation helps ensure that people are involved in the decisions that affect them. "Nothing about us without us" is a phrase that captures this principle of participatory governance.

Public participation in food policy can therefore protect and strengthen democracy. Defenders of European democracies should recognize the potential offered by people experiencing meaningful participation in food policy decision-making. This type of participation ensures that public policies are informed by lived experiences and alternatives developed "on the ground." The knowledge held by communities and practitioners can help administrative bodies and politicians identify and develop transformative policies that work for the communities and contexts they serve.

## Existing policy practices and initiatives

### The Local and Municipal Level

In Europe, public participation in food governance has become a highly dynamic field at the local level. Its most visible aspect has been the establishment of municipal food policy councils, often alongside the development of local food strategies. These are frequently combined with sectoral programs and projects on issues such as school meals, food poverty, public procurement, local and/or agroecological food production and value chains, territorial markets, and other elements of urban and peri-urban food systems.[51]

Food councils or food policy councils provide a forum for discussion, learning, and consultation for a range of actors, including public authorities, civil society, consumers, producers, processors, and researchers. These councils vary widely in (i) their functions and degrees of institutionalization; (ii) how they address the participation and inclusion of different food system actors, and (iii) how they frame agrifood transitions.[52] This publication highlights two examples.

*Field Note 2.1:*
**Valencia**

The Valencia Municipal Food Council was established through a participatory and consultative process entitled "Moving Toward a Municipal Food Council" throughout 2016 and 2017, during which social and economic actors involved in the local agrifood sector worked together to define the model, criteria, and fields of action for establishing a framework for local food governance.[53] The 2025 Valencia Agri-Food Strategy, developed and adopted by the Municipal Food Council and ratified by the Valencia City Council, anchors the right to food, agroecological transition, a local, proximity-based food economy, and participatory local food governance in its strategic lines.[54] The strategy is based on previously agreed policy principles, such as food sovereignty, agroecology, social and solidarity economy, and the city's commitments within the Milan Urban Food Policy Pact.[55] The strategy seeks to apply the city-region food systems approach, reinforcing the links between the city and the historic Huerta de Valencia, one of Europe's oldest peri-urban agricultural landscapes.

*Field Note 2.2:*
**Rome**

The Rome Food Council is a consultative body established in 2021 which currently brings together 205 organizations and grew out of a grassroots initiative spearheaded by a broad alliance of social organizations, farmers, and researchers.[56] Rome is one of the largest agricultural municipalities in Europe. It is home to over 3,000 farms, 70 municipal markets, several farmers' markets, and more than 50 solidarity-based purchasing groups (GAS). The objectives of the Rome Food Council are to define and monitor the implementation of Rome's food policy, to propose innovative policies, strategies, and ideas that make food systems sustainable, and to engage and encourage the local community to participate in policy implementation. The council focuses on several topics, including the agroecological transition, municipal markets, food poverty, and food loss and waste. In November 2025, Rome became the first Italian city to adopt a municipal policy to combat food poverty.[57] The resolution approved by Rome City Council stems from the work of the Food Poverty Task Force of the Rome Food Council. These efforts have been underpinned by an Observatory on Food Insecurity and Poverty, which operates as a collaboration between the Metropolitan City of Rome and a university consortium.[58]

Local and municipal food councils and policies have already achieved significant things. However, to be fully effective, they need to bring together different municipal departments at the local level and connect to the national and regional decision-making level, ensure effective and meaningful participation (particularly through marginalized communities), provide stable financing, and establish mechanisms that allow participants to contribute to developing, monitoring, and revising public policies and budgets. For these reasons, there has been strong advocacy for **multi-level governance** as the most suitable approach for addressing the complexity of the food system, given the broad range of the involved actors, legislative implications, and the need to uphold sustainability across economic, social, and environmental dimensions.[59]

## The National Level

Worldwide, the leading example of public participation in national food governance continues to be the National Council for Food and Nutrition Security in Brazil (CONSEA).[60] CONSEA is an advisory body to the Presidency of the Republic of Brazil. Its main task is to propose and monitor public policies related to food and nutrition sovereignty and security, and the human right to food. The council forms part of the National Food and Nutrition Security System (SISAN), which is responsible for the cross-sectoral management of public policies and coordination between the three levels of government (federal, state, and municipal).[61]

Two thirds of CONSEA's members represent civil society and one third the government. On the governmental side, all ministries with critical roles in food and nutrition security are part of CONSEA, including the Ministry of Social Development, the Ministry of Agrarian Development and Family Farming, the Ministry of Health, the Ministry of Education and the Ministry of Finance. Civil society members encompass a wide range of constituencies, including peasants and farmers, landless workers, homeless people, Indigenous Peoples, Afro-Brazilian communities, women's movements, fishers, consumers, public-interest NGOs, and research associations.

Thanks to its public policies and food policy council, Brazil was able to reduce undernourishment to below 2.5% by 2014, leaving the FAO Hunger Map". This great success was largely due to a combination of effective human rights-based programs and close coordination between the government and a highly engaged civil society. CONSEA was abolished following a change of government in January 2019. The Bolsonaro government dismantled or defunded public policies, which led to a rise in food insecurity. The Lula government reinstated CONSEA in February 2023 and the council played a critical role in developing said government's new food security strategy. In 2025, Brazil succeeded in leaving the Hunger Map again, with undernourishment falling below the 2.5% mark.[62]

## The European Level

In June 2023, the European Economic and Social Committee (EESC) proposed the creation of a European Food Policy Council (EFPC) to increase the quality and legitimacy of food policymaking and to achieve a more integrated, participatory, and democratic approach to food governance. The EESC suggested that the EFPC would serve as an

independent institutional body providing advice to EU institutions. It would improve coherence between different policy areas, such as the Common Agricultural Policy (CAP), Common Fisheries Policy, Farm to Fork Strategy, legislation related to healthy diets, public procurement, and education policies, and could eventually lead to the establishment of a network of food policy councils (FPCs) at the EU level. The EESC even offered to provide a convening space for the EFPC.[63]

This proposal was made in the context of the EU Framework Law for Sustainable Food Systems (FSFS), which the EU Farm to Fork Strategy had scheduled for adoption by the end of 2023. Legal experts and advocacy groups called for the right to food to be placed at the center of the FSFS as a solid and clear framework for the transition to sustainable food systems.[64] Following major political shifts within the EU, the European Commission put the Framework Law initiative on hold and instead published the less ambitious and more sectoral "Vision for Agriculture and Food" in February 2025, which included the creation of a European Board on Agriculture and Food (EBAF).[65]

EBAF is regularly convened by the EU Commissioner for Agriculture and Food and is composed of 30 EU-level organizations representing farmers, actors along the food supply chain, upstream and downstream industry interests, and civil society organizations focused on environmental protection, animal welfare, public health, and consumer interests.[66] In practice, it serves as a permanent advisory body to the Commission. Pointing to its limitations, experts and advocacy groups have proposed including EBAF as a component of a broader, more participatory and intersectoral food governance framework to be led by a European Food Policy Council.[67]

## Recommendations

Food is a critical area in which politics can overcome people's alienation from democracy, and people and communities can regain trust in democracy through meaningful and effective public participation. Political decision makers in Europe should play a leading role in strengthening participation in food policymaking at the municipal, national, and European level. They should:

**1. Encourage and support the dynamic and growing movement of participatory local food governance through**

- the creation and strengthening of municipal food councils, and the promotion of exchange and collaboration between them;
- the participatory development of local, territorial, and national food policies with an approach to connect urban and peri-urban food systems.

**2. Promote a multi-level approach to participatory food governance from the local to the national and European level, through**

- mechanisms of public participation that ensure the effective participation of rights-holder groups most affected by food insecurity and inequalities — including small-scale food producers — in these inclusive food governance mechanisms at the local, national, and European level;
- support for the proposal of the European Economic and Social Committee to establish a European Food Policy Council;
- development of an EU-specific regulation on sustainable and fair food systems built on the right to food.

# Chapter 3: **The Right to Food in Public Budgeting**



Public policies aimed at realizing the right to food need to be underpinned by an adequate budget. Guideline 12 of the Right to Food Guidelines, adopted by the FAO Council in 2004, highlights the need to mobilize national financial resources to support the progressive realization of the right to adequate food, including through budgeting for related policies and programs, and ensuring transparency and accountability.[68]

The concept of human rights budgeting is part of the broader concept of a "human rights economy" promoted by the UN High Commissioner for Human Rights. This concept recognizes that investment in economic, social, and cultural rights is fundamental for their realization, with the explicit aim of eliminating discrimination, empowering marginalized groups, and reducing inequality. At the national level, a human rights economy can be pursued by allocating the maximum available resources through budgets and taxation to meet the state's commitment to the rights to food, health, social protection, education, clean water, housing, and other fundamental rights.[69]

The FAO has developed a specific methodology for budget analysis in relation to ensuring the right to food, acknowledging that budgets are the most concrete and objective measure of a government's commitment to realizing the right to food. This methodology proposes a three-step procedure for countries. First, the focus should be on building a budget-relevant right-to-food case by providing evidence that a specific right to food problem relates to the public budget. Second, analysis of the budget should be carried out, specifically examining public revenue, budget allocations, expenditure, and the impact of the budget on the right to food. Finally, this methodology then calls for subsequent advocacy for corrective action wherever needed, based on the findings.[70] Elements of this methodology have been applied in some of the following examples.

## Existing policy practices and initiatives

The experiences and initiatives described in this chapter show that budget work on human rights and food and nutrition security is complex but also feasible and instructive. Legally established planning frameworks, or formal policy goals and indicators, can greatly facilitate the implementation of human rights-based budgeting.

### Brazil: Budget Analysis of the Food and Nutrition Security Agenda

A long-term budget analysis of public resources invested in implementing Brazil's food and nutrition security agenda was carried out for the period from 2000 to 2022. It provides useful insights into how assessments of this kind can be carried out and what can be learned from them. The assessment started from the premise that the right to food is firmly anchored in Brazil's constitution and legislation and guides national policies and plans on food and nutrition security. The analysis was therefore able to focus on budgetary actions in the context of the National Plan on Food and Nutrition Security. A total of 349,009 budgetary actions related to the food and nutrition security agenda were identified for this period, and included in the assessment. The data was collected by the Integrated Planning and Budget System, a publicly accessible system that compiles information on the federal government's planning and budgets.

The budget analysis found that investments in food and nutrition security showed an upward trend over more than two decades of public funding, with an annual average increase of 10%, though with major fluctuations in certain years. However, there was an imbalance in federal funding between strategic areas, with an upward trend in health (37.4 %), food sovereignty (23.7 %), and access to food (12.3 %), and a decline in investment in other areas, such as agrarian development (-7.0 %). The allocation of resources was concentrated on actions providing direct access to food, particularly through cash transfer programs, accounting for an average of 73.4 % of the total resources spent.

Given the severe cuts to certain public programs during the Bolsonaro government (2019—2022) and the rise in food insecurity during that period, the assessment shows that relying heavily on cash transfer programs did not prevent hunger from returning to Brazilian homes. The budget analysis therefore recommends ensuring stable and equitable funding across all critical areas in order to fulfill the right to adequate food.[71] Corrective action was taken by the subsequent Lula government in consultation with CONSEA after 2023 and contributed to Brazil leaving the FAO Hunger Map once again (see previous chapter).

## Human Rights Budgeting in Scotland

The Scottish Human Rights Commission has developed a program for human rights budgeting which in its definition means: "Taking a human rights-based approach to budgeting means distributing resources in a way that puts people first. Specifically, budget decisions should reflect human rights standards and the process of formulating, approving, executing, and auditing the budget should reflect human rights principles."[72]

In the case of the right to food, the Commission applies the steps of human rights budgeting: starting from Scotland's international human rights obligations and commitments, analyzing the human rights concerns relating to food, designing policies that respond to those concerns, allocating adequate budgets to implement those policies, monitoring whether the money was spent as planned, what was delivered and to whom, and evaluating whether the policy was implemented and what impact it had.[73]

In its submission to the Scottish Parliament regarding the 2024/25 budget, the Scottish Human Rights Commission requested that the Social Justice and Social Security Committee apply a human rights-based approach to its annual scrutiny of the Scottish Government's budget. Specifically referring to child poverty, the Commission noted that poverty is one of the biggest drivers of children's rights violations in Scotland, and the evidence suggested that the Scottish Government was missing its interim targets on child poverty reduction. For these reasons, the focus of parliamentary scrutiny should be on how the Scottish Government considers its legal duty to reduce child poverty in the budget process, and what it would fundamentally change in the budget to tackle child poverty more effectively.[74]

*Field Note 3.1:* **Rapid Analyses — Right-to-Food Budget Advocacy in Canada**

Right to Food Canada analyzed the Federal Budget Proposal 2025 "at a moment when millions are being forced to choose between rent, heat, and food," in one of the world's wealthiest countries. The organization's primary focus is on fighting food insecurity, with nearly 10 million people in Canada living in households that struggle to afford food. According to its "rapid" budget assessment, the government continues to treat food security as a by-product of economic growth rather than a fundamental right.[75]

In the organization's view, a public policy on food security would reframe food insecurity from a supply issue to a human rights and income adequacy issue. Its budget advocacy strategy calls for national targets to cut household food insecurity in half and eliminate severe food insecurity by 2030. It also includes specific proposals to increase income support for low-wage workers and people with disabilities, as well as significant public investment in Indigenous Peoples' food systems and food sovereignty.[76]

*Field Note 3.2:* **National Right-to-Food Action Plans and Budgets**

The former UN Special Rapporteur on the right to food, Michael Fakhri, devoted his 2025 report to the Human Rights Council to the interrelation between food, finance, and national action plans. In his conclusions, he provided a framework for states to use the right to food to develop national action plans and reconfigure national budgets accordingly.

His proposal includes a four-step approach: First, governments should conduct participatory conversations on the right to food and identify problems and potential solutions. Second, they should develop an overview of the right-to-food situation in the country, summarizing the existing legal frameworks and policies, and how they impact the right to food. Third, a right-to-food budget should be drafted to identify existing revenue, expenditure, and allocations related to the food system. Finally, a national action plan should be drafted based on the conversations, the overview, and the budget.[77]

## Human Rights Budgeting for the European Union

A remarkable initiative was launched by the UN High Commissioner for Human Rights to present Key Messages to EU Legislators on investing in human rights through the EU Multiannual Financial Framework (MFF) 2028—2034. The paper's overarching claim is that "investing in human rights is an investment in the EU's core values."[78]

Its ten key messages include recommendations to put human rights at the center of EU economic and budgetary decision-making; to use UN human rights recommendations to guide EU spending priorities; to mobilize the maximum available resources for economic, social, and cultural rights; to ensure funding matches real human rights needs; to ensure EU funds do no harm to human rights; to strengthen participation, transparency, and accountability in EU funding; and to use the MFF to strengthen the human rights ecosystem.[79]

The experiences and initiatives in Brazil, Canada, Scotland, and those put forward by the UN High Commissioner for Human Rights, the FAO, and the UN Special Rapporteur provide concrete examples of how to advance a human rights-based approach, or more specifically, how to anchor the right to food in national and regional budgeting processes.

One prerequisite for human rights-based budgeting is an explicit political commitment to, or legal recognition of human rights and the right to food in the national or regional context. Since almost all European countries have ratified the main international human rights treaties, they are legally bound to respect, protect, and fulfill the right to food, along with all other human rights. However, countries' human rights obligations have rarely been used as guiding criteria in the budgeting process to date.

### Recommendations

**Political decision makers in Europe, and particularly parliamentarians, should:**

**1. Promote a human rights-based approach to budgeting, specifically in relation to the right to food, by:**

- explicitly anchoring the right to food in the legislative framework and including it in policy targets, action plans, and public budgeting;
- developing national right-to-food action plans by applying a participatory process of right-to-food consultations at the national level in order to identify priority needs — particularly those of marginalized groups — setting specific policy targets and linking them to budget lines.

**2. Apply specific budget analyses to identify gaps and take corrective action for the progressive realization of the right to food by:**

- carrying out mid-term and long-term analyses of budget allocations, actual expenditures, and specific impacts on the right to food at the national and European level;
- taking corrective action in relation to problems identified by analyses at the national and European level.

**3. Promote budget design informed by international human rights obligations and establish related monitoring procedures, ensuring participation, transparency, and accountability by:**

- establishing monitoring mechanisms for implementing human rights-based budgeting with the respective bodies in national parliaments and the European Parliament, as well as with national human rights institutions, universities, and public-interest civil society groups.

# Chapter 4: **Supply Chain Traceability and Transparency**



European food systems are connected to a worldwide network of food workers, farmers, distributors, and transnational food corporations. Therefore, no matter how universal access to healthy food might be in Europe, if we rely on the right to food being undermined elsewhere, we are not realizing the right to food *anywhere*. Importantly, the right to food depends on the realization of other rights. In particular, if the rights to land, to a clean, healthy, and sustainable environment, or to just and favorable conditions of work and remuneration are not realized, reliable access to adequate food is also threatened. Currently, a lot of food sold in European supermarkets by European companies is or *might* be linked to the violation of these rights in the countries where the food is produced. [80]This is the case for food produced both outside and inside of European borders, as numerous cases highlighting the exploitation of (seasonal) migrant workers on European farms and slaughterhouses have made abundantly clear.[81]

But why emphasize that food in Europe *might* be linked to human rights violations? Besides the known cases, one crucial problem is rooted in what you *do not know*: Consumers do not receive sufficient information about the supply chain details of a product, such as its origin and the socioecological conditions under which it was produced. Nor do they have evidence that a product has been made in line with human rights. What is still largely missing is transparency — understood as the open sharing of information about a commodity's supply chain, including suppliers, human rights, and environmental conditions.[82]

In fact, supply chain transparency forms the basis for realizing the right to food. It provides citizens with the necessary knowledge to participate in democratic decision-making about the food system. Transparent supply chains are a promising antidote to "food from nowhere":[83] The disconnect between consumers and the people and ecologies that produce their food means that people could unknowingly support the social and ecological harms that make their food cheap. Indeed, human rights abuse and environmental destruction are consequences of a food system defined by pressures to reduce costs and increase profits. One of the easiest ways to cut costs is to externalize them — for example by not paying living wages to farm workers or destroying ecosystems while not paying for the resultant socioecological costs, including climate change. With access to this information, citizens can hold companies accountable for these harms. Along the supply chain, this would also pave the way for rights-holders to demand corporate accountability themselves. In this way, consumers and rights-holders together can build a food system that realizes the right to food for everyone, everywhere.

## Existing policy practices and initiatives

### Voluntary Measures: Showing that Traceability and Transparency are Possible

Unfortunately, it is a widespread misconception that transparent supply chains are impossible, mostly due to the assumption that there is no way to achieve full *traceability* — the ability to trace the entire supply chain back to the primary producer. This is far from true:[84] Some retail and manufacturing companies have responded to calls from labor unions and NGOs to shed light on their supply chains. This effort has been supported by public and civil society-led initiatives that have developed tools and technologies to increase supply chain traceability and transparency.[85]

In the cocoa sector[86], manufacturers have developed digital tracking systems that successfully trace the supply chain "from cooperative to chocolate production."[87] In the meat industry, approaches have been developed to trace (and disclose) the product back to the farm where calves are born.[88] Similar initiatives have been launched in the seafood sector.[89] In palm oil and soy supply chains, even large transnational food companies have started to respond to public pressure by disclosing lists of their (direct) suppliers.[90] Some supermarkets have made similar progress, as shown in *Field Note 4.1.*

Best practices for transparency (including traceability) combine different disclosure strategies.

Disclosing information on origin and human rights standards on the final product provides consumers with the information required to make informed choices about the food system. Publishing complete, regularly updated lists of suppliers allows civil society to verify the due diligence claims companies make on their products and websites (*Field Note 4.2*).

*Field Note 4.1:* **From Transparency to Responsible Sourcing — Voluntary Measures by Supermarkets**[91]

**Example:** Living wages in banana supply chains for Dutch and German supermarkets

**What happened:** In response to a campaign by Oxfam, several major supermarkets in Germany and the Netherlands pledged to work toward ensuring living wages in their banana supply chains, with four companies "claiming they've closed their share of the living wage gap."[92] One crucial aspect of implementing this promise was establishing transparency in companies' banana supply chains: four supermarkets published lists of their direct and indirect banana suppliers, and two published assessments of living wage gaps within their banana supply chains.[93]

**Key flaws:** Transparency does not guarantee accuracy. While the disclosure of wage standards is important, the method used for measuring wages is equally crucial. If trade unions and workers are not at the heart of these processes, the data most likely significantly overestimates the wages received. Furthermore, not all major supermarkets responded to the campaign with a commitment to living wages and transparency in banana supply chains — showing that relying on voluntary measures alone is not enough.

The challenges of establishing full traceability (and therefore transparency) vary by product and depend on the number of indirect suppliers and smallholder farmers.[94] The latter feed much of the global population, yet their reliance on informal markets and their limited access to capital put them at high risk of being harmed by technology-intensive traceability requirements. For this reason, transparency measures need to be developed with particular attention to protecting the livelihoods of smallholders. While more complex, such measures are still feasible, as existing examples of smallholder-inclusive traceability have shown.[95]

However, voluntary transparency measures are not enough. First, "for a sector-wide transformation", these measures need to be accompanied by legal requirements that "continue raising the bar with respect to traceability, reporting, and disclosure requirements."[96] The problem is not that supply chains cannot be traced, but that companies are not legally required to develop the necessary tools to do so.[97] Second, transparency is not an end in itself. It is a means of making human rights conditions visible. For this reason, it needs to be linked to clear human rights and environmental due diligence obligations that can be used to hold companies accountable. A fundamental change is unlikely if respect for human rights remains a choice or is only used as a selling point aimed at more affluent consumers. Voluntary measures "have been insufficient to prevent severe environmental degradation and human rights abuses."[98]

## Legally Binding Regulations: Forcing Companies to Disclose their Supply Chains

In a major success for civil society advocacy for legally binding due diligence regulation, France introduced the Duty of Vigilance Law (DVL) in 2017. In 2021, this was followed by Germany's Supply Chain Due Diligence Act (LkSG) and the Norwegian Transparency Act (TA). These regulations make companies responsible for respecting human rights along their entire supply chains and define mandatory due diligence procedures.[99] The French law — the only one to include civil liability — "has created a [unique] legal framework [that] provides NGOs and affected communities with a judicial pathway to challenge the … human rights practices of some of the world's largest companies."[100] The Norwegian TA — based on the idea of "change through transparency"[101] — has been designed as a legal instrument that allows consumers to learn about the conditions under which their products were made. Apart from requiring a publicly available due diligence account, the law grants every person "the right to information from an enterprise regarding how the enterprise addresses actual and potential adverse impacts" to be provided within three weeks.[102] Building on these national laws, in 2024 the EU passed the Corporate Sustainability Due Diligence Directive (CSDDD). In its original form, the CSDDD represented a milestone in upholding human rights across European supply chains. Though the 2026

Omnibus I Directive seriously watered down the scope and mechanisms of the CSDDD,[103] it still includes several strong points, particularly the integration of civil liability.[104] Overall, these laws at the national and European level offer a much-needed legal basis to hold companies accountable, and have forced the largest European corporations to examine the human rights risks along their own supply chains — in many cases for the first time.[105] This is an important first step.

At the same time, these regulations do not go far enough — particularly because they lack sufficient transparency requirements. Enforcement of the national laws has been weak,[106] but rights-holders, together with trade unions and civil society representatives, have begun to make use of them. However, they often lack the information they need to assess the performance of companies or to identify which European companies downstream are responsible for human rights violations further upstream; they are forced to undertake resource-intensive research to trace highly complex and opaque supply chains.[107] Indeed, although the laws contain public reporting obligations,[108] these do not create sufficient transparency about companies' human rights measures or about their suppliers. Assessments of the transparency-focused Norwegian law have found that companies' due diligence accounts "do not provide enough information regarding risks to human rights in supply chains." They also found little progress in creating an informed public, noting that the law requires "a level of expertise that cannot be expected from the average person."[109]

Though it sets more demanding traceability obligations, EU-level legislation on deforestation-free supply chains (EU Deforestation Regulation, EUDR)[110], applying from December 2026, will not solve this transparency issue either. The EUDR requires companies to demonstrate that the products they import, export, or trade on the EU market are deforestation-free and traceable. To comply with the regulation, companies must collect data on a product's origin, including the geolocation of where it was grown, raised, and processed.[111] However, companies are not obliged to make this information public or disclose full supplier lists.

*Field Note 4.2:*
**The Strengths and Limitations of Current Due Diligence Regulation**[112]

**Example:** The impact of the German Supply Chain Due Diligence Act

**What happened:** Assessments of the German law show that it has been successful in prompting companies to act on human rights abuses within their supply chains: "People in the supply chains of German companies around the world are using the Supply Chain Act to assert their rights. Many have reported a fundamental change in their relationship with German companies or their local suppliers and say that they are being taken seriously for the first time."[113] In Honduras, for instance, members of a smallholder community had allegedly been murdered, attacked, and threatened by a palm oil producing company. With the support of a human rights organization, the community then informed German companies buying palm oil from that producer. Grievance processes were initiated, and at least four companies removed the producer from their supply chain, in some cases even at group level.

**Key flaws:** One central weakness of this law is its lack of transparency requirements. As European companies are not obliged to disclose their supplier lists, communities experiencing human rights abuses at the hands of producers do not have the information they need to identify the European companies sourcing with them. If a company does not flag this specific part of their supply chain as a risk area under the law's risk assessment procedures, and therefore does not report on it, the company's breach of this due diligence law is almost impossible to detect — and depends on the "detective work" of labor unions and civil society organizations. In the Honduras palm oil case, extensive and costly investigations by supporting NGOs were necessary, and even so, large parts of the supply chains to Germany probably remain a black box.

In addition, the law has come under attack. The German government intends to weaken it as part of the implementation of the watered-down CSDDD, which is already hampering the work of the responsible federal office. This would drastically reduce the law's scope: if the scope of the CSDDD were transposed into German law, 95% of the companies currently covered would no longer be covered.

One EU-wide instrument that is taking a step toward mandatory disclosure of supply chain information is the Digital Product Passport (DPP), which is gradually entering into force for different product categories in the coming years. Companies will be required to collect information on the composition and environmental impact of a product, and to disclose this via a data carrier that consumers can scan.[114] The DPP focuses mainly on environmental circularity[115], and agricultural products are currently excluded from its scope.[116] If adapted, however, it has the potential to close transparency gaps in the enforcement of human rights-related due diligence regulations in high-risk food supply chains such as palm oil, soy, meat, cocoa, and coffee[117]. Product-specific EU regulations such as the EU Battery Regulation, for instance, already require the inclusion of information on responsible sourcing in the passport.[118]

## Recommendations

**Political decision makers should:**

**1. Develop new or strengthen existing national and EU human rights and environmental due diligence regulations, including mandatory traceability and transparency requirements and standards that enable the monitoring and enforcement of compliance. Specifically, they should:**

- develop requirements and EU-wide standards for sharing lists of direct and indirect suppliers with stakeholders, affected communities, labor unions, civil society organizations, and enforcement authorities;[119]
- develop requirements and EU-wide standards for the public disclosure of aggregated information on a product's supply chain, such as through scannable product codes that offer information on product origin and human rights due diligence.[120]

**2. Ensure that traceability and transparency requirements and standards are designed with the primary aim of protecting the rights of the most marginalized communities in food supply chains, guaranteeing that:**

- costs, risks, and administrative burdens are not shifted onto small-scale producers;[121]
- the livelihoods of informal producers and the safety of human rights defenders are not threatened.

**3. Develop and invest in accessible tools and approaches for traceability in high-risk food supply chains, prioritizing the needs and capacities of small-scale producers and specifically:**

- focusing on traceability beyond tier-1 suppliers;
- including safeguards that guarantee the participation of affected communities in data collection and ensure their access to data.

**4. Transpose the Corporate Sustainability Due Diligence Directive (CSDDD) into national legislation, including introducing civil liability requirements into national law, while:**

- maintaining at least current levels of human rights protection in existing national due diligence legislation;[122]
- promoting the long-term strengthening of the CSDDD with a view to realizing the human right to food, including by adding traceability and transparency requirements.

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## CHAPTER 4

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