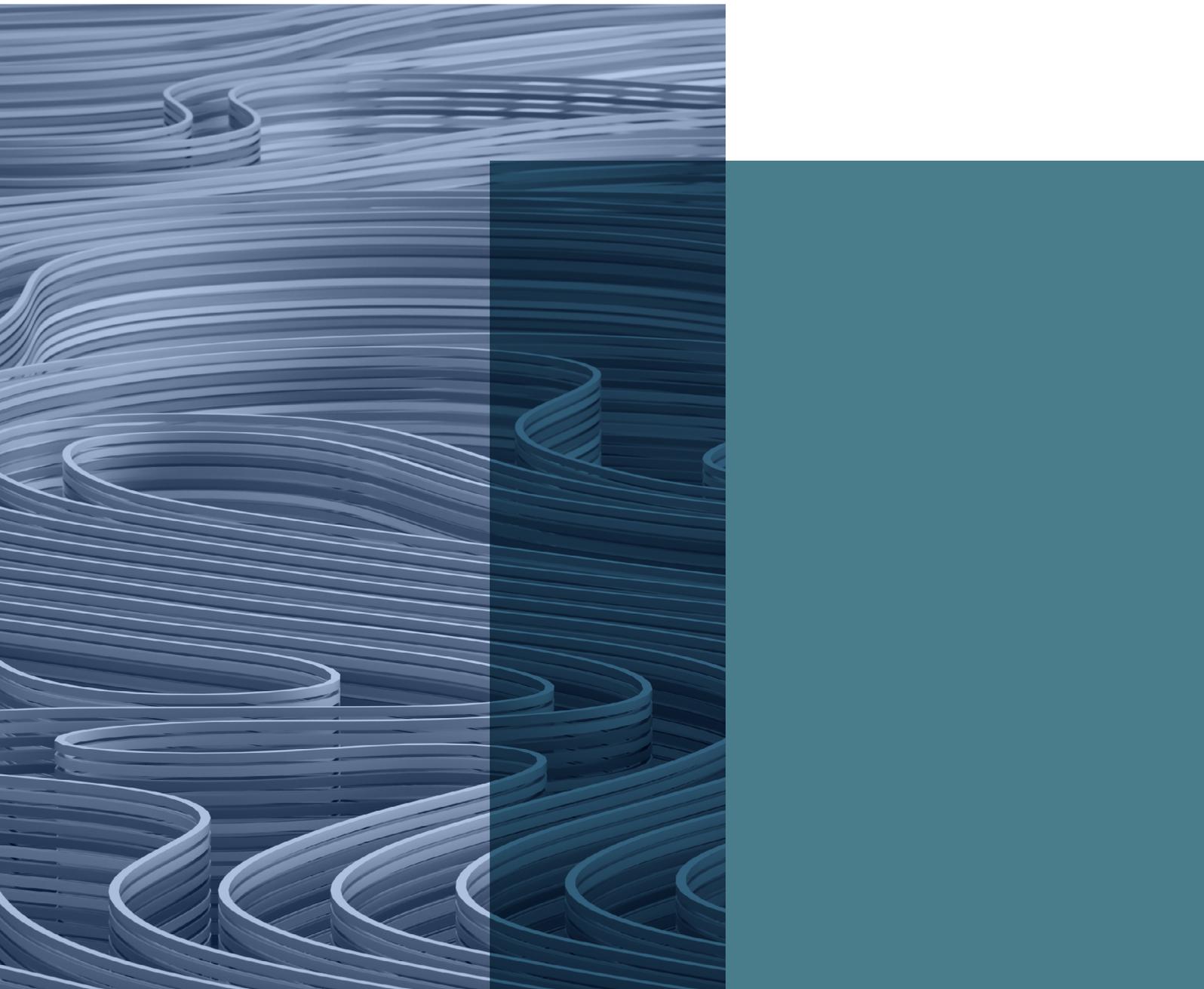


From Fragmentation to Transformation

MULTI-LEVEL POLICY MIXES FOR SUSTAINABLE HEALTHY
FOOD ENVIRONMENTS IN BELGIUM



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Executive summary

Current dietary patterns in Belgium contribute significantly to non-communicable diseases and environmental degradation, highlighting the urgent need for a transition towards more healthy and sustainable diets. Achieving this hinge upon a corresponding transition in food environments. Food environments refer to the physical, economic, institutional and socio-cultural contexts in which people make food choices. Governments at European, national and local levels all hold competences, hence responsibilities to improve food environments. Belgium's nested federal structure and fragmented policies across competences, domains, and governance levels is prone to induce political inertia and slow down coordinated action. Addressing food environments in a coherent and consistent way requires overview and synthesis for policy makers to develop an integrated approach.

This report systematically maps and evaluates existing policies and provides priority recommendations to render Belgium's food environment policy mix more transformative. Besides the federal government, it concentrates on Flanders, Wallonia, Brussels-Capital Region, COCOF, CFWB, VGC and Ostbelgien. Using the Food-Environment Policy Index (Food-EPI) as starting point, a comprehensive mapping of policies shaping healthy, environmentally sustainable food environments was conducted, followed by an expert evaluation involving 51 participants across Belgian regions. The current policy mix was then assessed on its overall intensity, its balance across different policy instruments, and its alignment with intervention points necessary for transition dynamics, as defined by the Six Policy Intervention Points (6IP) framework. To identify and prioritize policy recommendations, co-creative policy workshops with 48 experts were organized. The resulting recommendations were further supported by a legal analysis on competence division.

The findings reveal significant disparities in policy activities to address food environments across governance levels and policy domains. While dense policy activities were observed in public procurement and norm management, clear voids were identified in zoning laws and marketing regulations. When integrating evaluations across federal, regional and community levels, policy intensities were highest Flanders, followed by German-speaking Belgium, Wallonia and Brussels. This could indicate both different intensities and complementarities of policies across integrated institutions. The majority of policy instruments were information-based and focussed on the development and scale-up of alternative products, as well as on multi-actor coordination. In contrast, regulatory and economic instruments were remarkably less deployed at each level of jurisdiction. The same holds for policies targeted at the phase down of unhealthy, unsustainable products and practices and the anticipation and management of induced socio-economic disruption.

A total of 158 policy recommendations were developed and prioritized to more effectively address food environments. These recommendations are more balanced between information-based and regulatory and economic instruments than the current policy mixes and are focused more intensively on phase-down policies. Interestingly, several similarities in recommendations appeared across the different subnational entities, reflecting the potential to gain coherence and shape a more unified national vision on food environments. This study offers a comprehensive assessment of Belgium's food environment policy landscape. The results highlight crucial areas for intervention, emphasizing the need for a more balanced and proactive policy mix to drive the transition towards sustainable healthy diets through improving food environments.

Key Recommended Actions

Federal

- Restrict advertising of unsustainable unhealthy food products in public spaces and events
- Earmark fiscal strategies for promoting sustainable healthy food choices
- Regulate advertisements for unhealthy, unsustainable food products on social media
- Develop a consumer price index on sustainable, healthy food baskets as a monitoring tool
- Develop ambitious minimum criteria for sustainability and nutrition in public procurement practices
- Recognize access to healthy, sustainable food as a fundamental right in Article 23 of the constitution
- Develop an overarching strategic plan on nutrition, health, sustainability and inequalities at national and inter-federal levels

Flanders

- Facilitate the implementation of existing strategic policy frameworks through capacity building
- Further develop food literacy and understanding of front-of-pack labels, across all age groups
- Develop a legal framework for local governments to regulate physical food environments
- Embed sustainable healthy food initiatives within broader poverty reduction strategies
- Establish a long-term vision that reflects clear and deliberate choices for future food environment policies
- Develop a toolkit for cities and municipalities to support the implementation of effective food policies
- Demonstrate tangible short-term benefits of investments in preventive food policies

Walloon Region

- Support emerging businesses and initiatives promoting sustainable, healthy food
- Limit the concentrated establishment of food outlets offering unhealthy, unsustainable food in proximity to living environments such as schools
- Encourage negotiated pricing policies among stakeholders across supply chain in favour of healthy, sustainable food, ensuring fair remuneration to actors involved
- Strengthen infrastructure and logistics support to ensure coherence between links in supply chain of sustainable, healthy food

Brussels Capital Region

- Safeguard an exemption of subsidies for industries producing unhealthy and unsustainable foods
- Expand the criteria for the Good Food label to also include nutritional standards
- Establish a platform for exchange on environmental and health policies between different jurisdictions in Brussels – the region BCR and communities.
- Establish social security budget for food with criteria for healthy, sustainable products for BCR citizens

French Communities - COCOF & CFWB

- Shield educational institutions from commercial influences more stringently
- Marketing restrictions for unhealthy unsustainable foods at events and sports clubs
- Provide overview and harmonization of ongoing initiatives on healthy, sustainable food across public entities
- Free healthy, sustainable meals in schools and kindergartens
- Conduct more impact evaluations of implemented policies
- Provide financial support to local authorities to coordinate food-related actions

Transversal

- Improve horizontal coordination within and across jurisdictions to ensure policy coherence
- Improve vertical coordination between federal, regional and community level to optimize complementarity
- Enhance cross-sectoral collaboration with food as a transversal theme

The need to address food environments

High income countries have been reaping the benefits of an increasingly efficient food system, as reflected in food and beverages being more available, affordable and safe than ever. However, the wake of this success has also been operating as breeding ground for collateral challenges. Their latent and chronic nature may explain but should certainly not justify the limited sense of urgency being reflected in public policies today.

Troublesome are dietary compositions and notably their excess in animal-based proteins, saturated fats, added sugars and ultra-processed foods, mirroring deficiencies in legumes, nuts, fruits and vegetables. This echoes a rise in chronic diseases - including cancer, diabetes, cardiovascular- and respiratory diseases - and a plethora of ecological repercussions - including biodiversity loss, climate change, land degradation and water eutrophication.^{1 2 3 4}

Being rooted in diverse technology-, infrastructure-, and value systems, curbing this alarming trend depends on a range of transition dynamics. Incremental changes are needed, e.g. by gradually reducing the content of critical ingredients in food product compositions. Substitutions are also needed, e.g. by replacing excessively consumed products with their deficient counterparts. In addition, though often overlooked, more systemic changes that reshape the system's architecture are also needed.

The system driving dietary compositions is multi-faceted, with many sub-systems of influence and touchpoints in diverging contexts. Today, the influential role of food environments is strongly established.⁵ Following the definition of the Food and Agriculture Organization of the United Nations: *"The food environment refers to the physical, economic, and socio-cultural contexts in which people make food choices. It encompasses the availability, accessibility, and affordability of food, as well as the types of food offered, the marketing practices used, and the social norms and cultural practices that influence eating behaviors."*

This widened lens on food environments is necessary to face challenges linked to food consumption patterns. At the same time, this view might overwhelm and dilute the focus of pivotal actors, like policymakers, to advance effective policy implementation. Diffusely scattered policies across competences, policy fields and governance levels might be driving political inertia. This voices earlier calls by the World Health Organization for more synthesis, benchmarking and monitoring of food environment policies.^{6 7}

Food Environment Policies in Belgium

2.1 Institutional context

Belgium is a federal state with two different subnational entities, the regions and communities, that are geographically overlapping. This results in an above average sophisticated state structure. Therefore, a condense overview of its institutional structure is needed to set the scene of this report. Since becoming a unitary state in 1830, Belgium has undergone six state reforms (between 1970 and 2014), progressively transferring powers from the central government to the subnational entities with their own government and parliament.

This division follows two historical fault lines. The first one is economic and led to the three Regions - Flemish Region, Walloon Region, and Brussels-Capital Region – being competent for “land-related matters” like environment and agriculture. The second fault line is cultural and led to the three Communities (Flemish Community, French Community and the German Community) competent for “people-related matters” like education and media.

Since 1980, the Flemish Region and Community operate as one single entity with one government and parliament, whereas the French- and German Communities still operate independently within the Walloon Region. In the Brussels-Capital Region, both the French- and Flemish Communities are represented by distinct entities¹: the French Community Commission (COCOF) and the Flemish Community Commission (VGC). For matters that are not solely linked to one community, the COCOM (Common Community Commission) is competent to implement joint policies that affect both the French- and Dutch-speaking communities.

Apart from the federated entities, the federal state remains competent for several important matters and does not superimpose the regional and community levels. Finally, it needs to be mentioned that important competences also remain at the European and local level.

2.2 Food environments in Belgium

Within this nested institutional context, the global trends introduced earlier are clearly being translated at the Belgian national level, with about 49% of its population being overweight and 18% suffering from obesity.⁸ Associated spendings on public healthcare costs have been estimated between €1.85 bn and €3.3 bn annually.⁹¹⁰ Average Belgian food consumption patterns fall short on recommended intakes for fruits, vegetables, nuts and seeds, while exceeding recommended intakes for sugar-sweetened beverages and processed meats.¹¹ In addition, ratios of animal-based to plant-based proteins are largely outbalanced, as is the share of ultra-processed foods, both being linked to significant environmental impacts like climate change and land use.¹² These trends are driven by notable evolutions in the Belgian food environment. Throughout recent years, a rise in food deserts and food swamps is being observed.¹³ The proximity of fast-food and convenience stores near schools has been linked to children’s weight status,¹⁴ and in-store retail environments are largely promoting unhealthy food products.¹⁵ Beyond that, healthy food outlets are unevenly distributed across socioeconomic statuses, perpetuating health inequalities.¹⁶ Irrespective of their accessibility, the cost of healthy diets remains a significant barrier for many households in Belgium.¹⁷ Unlike in most European countries, no systematic mapping and evaluation of policies addressing food environments have been conducted in Belgium so far.¹⁸

1 Given that COCOM has limited competences relevant for food and preventive health promotion, the COCOM is not further considered in this report.

Methodological Approach

3.1 Food Environment Policy Index (Food-EPI)

The Food-EPI is an internationally standardized tool and process, developed by the International Network of Food and Obesity/NCDs Research, Monitoring and Action Support (INFORMAS), used by public health nutrition scholars to support local, national, and EU governments in identifying implementation gaps and recommending measures to create healthy food environments to prevent obesity and diet-related NCDs.^{18 19 20}

As a mapping tool of healthy food environment policies, the Food-EPI consists of 47 good practice indicators, clustered in 13 domains across two components: policies and infrastructure support (Fig. 1). As a process, the Food-EPI usually unfolds sequentially over a mapping phase, an evaluation phase and a recommendation & prioritization phase. In the mapping phase, a comprehensive evidence document of all relevant strategies and policy instruments for each indicator is being compiled and verified by relevant government officials. The mapping phase covers the entire policy cycle from policy development to implementation and monitoring. In the evaluation phase, this evidence document is then reviewed and evaluated by expert panels on its 'level of implementation' for each indicator. The recommendation phase than uncovers implementation gaps and includes the development of targeted recommendations, followed by prioritization. To date, the Food-EPI has been implemented globally across more than 50 jurisdictions, including 11 European countries.¹⁸

This report mainly rests on a Food-EPI application, yet with a widened lens that covers policies contributing to the promotion and creation of both environmentally sustainable and healthy food environments (Annex 1).

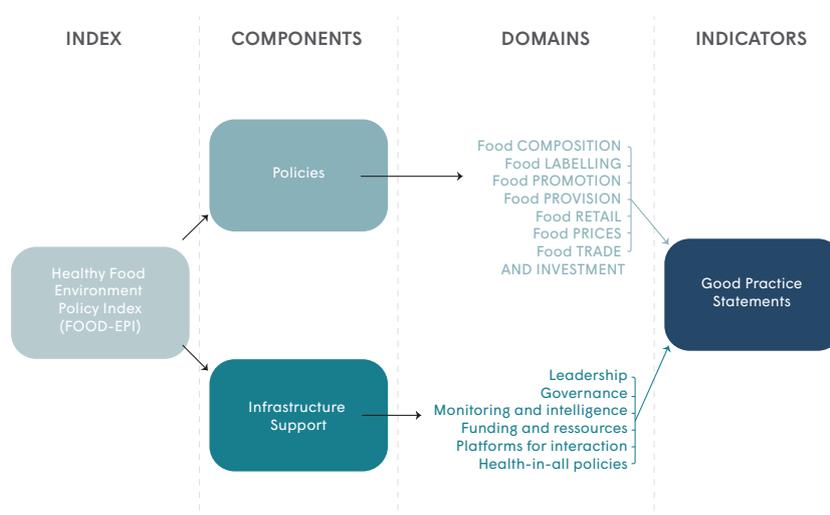


Figure 1: Framework of the original Healthy Food-EPI Tool

3.1.1 Delineation of focal policy mix

The horizontal scope of this study contained all public policies affecting healthy and environmentally sustainable food environments directly (e.g. agriculture, public health). The original Food-EPI good practice indicators were therefore adapted to this scope (Annex1). However, policies targeted more upstream in the supply chain (i.e. related to food production and processing) were considered out of scope. The vertical scope spanned the federal, regional and community level governments in Belgium. This translates to eight jurisdictions under consideration, including the federal government, the Flemish government, the Walloon government, the Brussels-Capital Regional (BCR) government, the French Community government (CFWB), the German Community government (DG), the French- and Flemish Communities in Brussels (COCOF and VGC). Local, European and international levels were not in the scope of this study.

3.1.2 Policy Mapping

The compilation of evidence on development and implementation of good practice policies per territory involved the following steps in iteration:

1. Identifying relevant stakeholders in government organizations, departments and ministries.
2. Conducting desk research to gather strategies and instruments from official sources.
3. Drafting detailed evidence reports for each jurisdiction.
4. Conducting in-depth consultations by telephone or face-to-face with public servants to refine the collected evidence.
5. Performing a legal analysis on competence divisions.
6. Reviewing and enriching evidence documents based on consultations and legal insights.
7. Verifying the documents with public servants.
8. Finalizing the evidence documents, organized by jurisdiction.

The collection of evidence took place between May 2023 and May 2024 and was consolidated in separate evidence report by territory (Annex 2).

3.1.3 Evaluation of Policy Mix Intensity

A panel of 51 experts working at relevant public administrations (n = 18), academic units (n=14) and NGOs & other civil society organizations (n = 19) across Belgian regions was recruited in April 2024. The panel did not include industry representatives. Panellists were invited to read the entire overview of food environment policies for one of the three territories (i.e. (1) federal and Flanders or (2) federal, BCR, COCOF and VGC or (3) federal, Walloon Region, CFWB and DG) and complete an online questionnaire, with an evaluation of each good practice policy across the 13 domains for each entity individually. The evaluated intensity was derived from a 5 points Likert scale (1 = No or very weak policy, 2 = weak policy, 3 = moderate policy, 4 = Strong policy and 5 = Very strong policy). Average ratings per indicator were calculated, as well as the level of agreement between raters, relying on a Gwet AC2. Finally, an integrated measure of policy intensity was derived per area through vertical integration, while accounting for competence division.

3.1.4 Ideation Workshops

This final step aimed to ideate on feasible and relevant enhancements of the identified policy mix. Three workshops – one per jurisdiction - were organized over three days in Brussels, September 2024. A balanced panel of public servants (n = 18), academics (16) and NGO & other civil society organizations (n = 13) participated to the discussions. A longlist of actions was then formulated through discussion, structured by the evidence documents and ex-ante evaluation of intensity. A prioritized selection of actions was then obtained by a rating exercise in terms of relevance and feasibility. Only prioritized actions are included in the body of this report but the longlist is added in Annex 4.

3.2 Legal analysis

In support of the policy mapping and formulation of recommendations, this study employed a legal doctrinal research methodology to examine the division of powers between the federal government and subnational entities in creating sustainable, healthy food environments through various regulations. It conducted an in-depth analysis of the Belgian Constitution, relevant special laws, and pertinent case law from the Belgian Constitutional Court and the Council of State. It also incorporates legal doctrine to provide a thorough understanding of the legal framework governing food regulation. By synthesizing these sources, the report aims to clarify the roles and responsibilities of different levels of government in shaping policies related to sustainable healthy food environments.

3.3 Six Policy Intervention Points for Transitions

In addition to public health promotion, sustainable, healthy food environments also present a topical transition issue. Therefore, in addition to the Food-EPI, this report also applies a second lens that enables an analytical approach to inform policies from a transition perspective. Socio-technical transitions have long been theorized by distinct configurations of interplaying dynamics at three levels: (1) emerging innovation -“niches”- (2) existing structures - “regimes”-, and broader societal trends -“landscape”.^{21 22} The Six Policy Intervention Points Framework accounts for this layered view and provides an actionable lens for policy makers.²³ Addressing all these six intervention points is important to manage transitions effectively. This framework has recently seen an increasing number of applications to agrifood policies including at EU and national levels.^{24 25 26} An overview, tailored to the case of food environment transitions, is given in Table 1 below.

Table 1: Six Policy Intervention Points for Transitions (Source: Adapted from Kanger et al., 2020 & EEA 2022)

INTERVENTION POINTS	DESCRIPTION	EXAMPLES
IP1: Niche stimulation	Stimulate the emergence of alternative products and practices.	R&D funding schemes, education and training programs
IP2: Niche acceleration	Accelerate diffusion of alternative products and practices through upscaling, institutionalisation and replication.	Incubators, public procurement, standards and labels, advisory services, tax exemptions
IP3: Destabilizing regime	Phasing down unhealthy, unsustainable products and practices.	Taxes, zoning laws, regulations on advertising, dismantling supportive tax structures
IP4: Address repercussion of regime destabilization	Anticipate and manage socio-economic disruption	Support for reskilling, creative labor adjustment programs, chefs training, compensation schemes
IP5: Coordination multi-regime interactions	Utilize synergies between incumbent actors and optimize consistency and coherence of policies	Intersectoral cooperation, coupling health, environmental sustainability and food policy, overarching strategies across policy areas, impact assessments
IP6: Tilt the landscape	Alter broader framework conditions and give direction to change	Overarching strategic frameworks supranational (e.g. European Green Deal, SDG's,...)

3.3.1 Classification of Policy Instruments and Intervention Points

Based on the compiled evidence documents (Annex 2), concrete policy actions that target transition dynamics through one of the six intervention points for policymakers were identified. To roughly situate these actions in the policy cycle, a distinction was made between strategic communication (agenda setting and policy formulation) and deployed instruments (both substantive & procedural and both under development & already implemented). Within instruments, a distinction was made between economic, regulatory or informational instruments. Finally, the most prominent intervention points for transition were assigned to each individual action. This classification followed a blinded triangulation approach with three independent coders. In case of disagreement, the outcome obtained by two of the three coders was finally selected.

3.3.2 Assessment of Balance in Policy Mixes

A final step in the analysis was the calculation of a measure of balance in instrument types and in intervention points of the policy mix.²⁷ Following earlier applications, a Gini-Simpson Index was calculated, with values between 0 – 1. This index should be interpreted as higher values reflecting a more balanced mix of instruments or intervention points. A more balanced mix of instruments is generally considered to be more effective in achieving policy goals.²⁸ With respect to intervention points, it is simply postulated here that all intervention points are necessary in all transition processes, hence the focus on balanced intervention points.

Table 2: Overview strategies and number of used instruments by jurisdiction

	FEDERAL	FLANDERS	WALLONIA	BCR	CFWB	COCOF	VGC	DG
Strategies	<p>Federal Plan Nutrition & Health , 2016 – 2020</p> <p>National Biodiversity Strategy, 2013 – 2020</p> <p>Federal Plan Sustainable Development, 2021 – 2024</p> <p>Federal Long Term Vision for Sustainable Development, 2013</p> <p>Federal Plan Poverty Reduction, 2022 – 2027</p> <p>Government Agreement 2020 – 2024</p>	<p>Flemish Food Strategy (Go4Food), 2023–2030</p> <p>Flemish Protein Strategy, 2021–2030</p> <p>Strategic Plan: “De Vlaming Leeft Gezonder in 2025”, 2016–2025</p> <p>Flemish Action Plan for Poverty Reduction, 2020–2024</p> <p>Recovery Plan “Vlaamse Veerkracht”, 2021</p> <p>Government Agreement & Policy Notes, 2020–2024</p>	<p>Framework “Vers un système alimentaire durable en Wallonie”, 2018</p> <p>Strategy “Manger Demain”, 2018</p> <p>Action Plan “Food Wallonia”, 2022</p> <p>Prevention and Health Promotion Plan for Wallonia 2030 (WAPPS 2030)</p> <p>Walloon Health Promotion Program, 2023–2027</p> <p>Walloon Nutrition, Health, and Well-being Plan for Seniors (PWNS-be_A)</p> <p>Walloon Poverty Exit Plan (PlanSoP), 2019–2024</p> <p>Walloon Recovery Plan (PRW), 2021–2024</p>	<p>Strategy Good Food 2 (2022 – 2030)</p> <p>Regional Innovation Plan (2021 – 2027)</p> <p>GSET-strategy</p> <p>Good Move-strategy 2020 – 2030</p> <p>Resources and Waste Management Plan (2018)</p> <p>Regional Policy Declaration (GBV) 2019 – 2024</p>	/	<p>Integrated Welfare and Health Plan (GWGP/PSSI)</p> <p>Health Promotion Plan, 2023–2028</p>	<p>Multi-Year Plan 2022–2025</p>	<p>Concept for Health Promotion in the German-Speaking Community (2017)</p> <p>Decree of the Government on Defining the Key Areas of Health Promotion for the Years 2020 and 2024</p>
Number of instruments	31	61	38	14	12	10	15	18

Findings and Implications

4.1 Strategies and Instruments

A total of 31 overarching strategies and 200 instruments have been found through the policy mapping (Table 2). As displayed in Figure 2, most of these instruments observed were informational (n=168) compared to the minority being regulatory (n = 25) and economic (n = 37). The number of information-based instruments were more than four times higher than economic instruments and almost seven times higher than regulatory instruments. The resulting policy mix overall could be considered relatively imbalanced with a value of 0.43.

When comparing different government entities (Fig 3), the federal government implemented the highest share of regulatory instruments (31%) followed by the Brussels-Capital Region (15%), Flanders (10%), CFWB (8%), DG (6%) and Wallonia (4%). No regulatory instruments were observed for the COCOF and VGC, but this should be considered mainly a reflection of the institutional configuration, as decretal competences are limited for these entities. Mirroring this, the highest share of informational instruments was observed for COCOF (93%), followed by VGC (88%), DG (83%), Flanders (78%), CFWB (75%), Wallonia (69%), Brussels Capital Region (67%) and the federal government (53%) having the lowest share. With respect to economic instruments, the highest share was observed for Wallonia (26%), followed by Brussels-Capital Region (19%), CFWB (17%), federal (17%), VGC (13%), Flanders (12%), DG (11%) and the COCOF (7%).

In terms of balance in instrument type, the federal policy mix was most in balance (0.6) while the least balanced was the mix of COCOF (0.1). Important to note is that balance in instrument type was not necessarily correlated with the number of used instruments. For instance, the CFWB's policy mix with only 12 instruments was more balanced (0.44) than the Flemish mix with 61 used instruments (0.36).

In support of these observations, it should be highlighted that the dominance of informative instruments does not align with the scientific consensus that a more balanced mix of instrument type is needed for effective acceleration of food environment transitions.⁵ In line with this, a plea for the implementation of more regulatory and economic instruments is of course not new²⁹ but has been strengthened by the reported results.

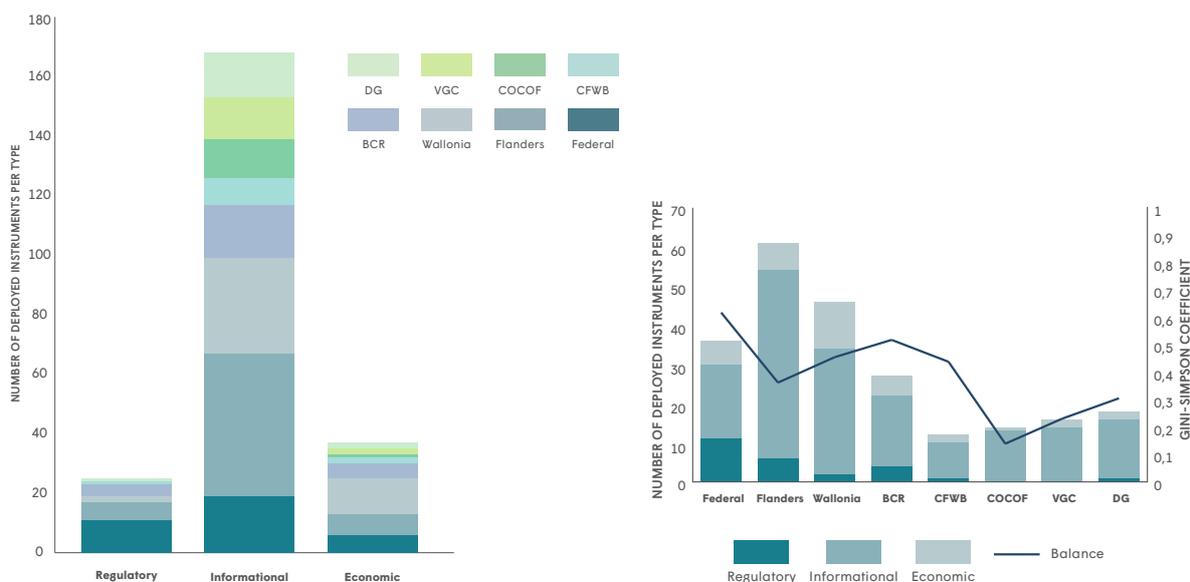


Figure 2: Instruments deployed per type

Figure 3: Distribution of deployed instruments per type and per entity. A measure of balance across these three types is calculated as Gini-Simpson Coefficient

4.2 Policy Mix Intensity

For each government entity and Food-EPI good practice indicator, mean policy intensity scores are reported in Table 3. Evaluations of indicators applied to jurisdictions without relevant competence have been excluded ex post, based on the legal analysis, and are reported as blank cells. The Gwet's AC2 values across jurisdictions indicate generally good levels of agreement between the raters. Almost perfect agreement was observed for the CFWB (0.94; 95% CI = 0.92 - 0.96), the VGC (0.94; 95% CI = 0.92 - 0.96) and Ostbelgien (0.93; 95% CI = 0.91 - 0.95). Substantial agreement was observed for Wallonia (0.84; 95% CI = 0.80 - 0.88) and the Federal state (0.80; 95% CI = 0.68 - 0.92). Moderate levels of agreement were observed for Flanders (0.72; 95% CI = 0.60 - 0.84), COCOF (0.71; 95% CI = 0.59 - 0.83) and BCR (0.67; 95% CI = 0.43 - 0.91).

Policies on **product reformulation and front-of-pack labeling**, both mainly federal competences, were assessed as weak to moderate. The federal government issued several royal decrees as well as covenants regarding standards in food composition. Additionally, the endorsement of Nutri-Score as a front-of-pack label was formalized in a royal decree in 2019. In contrast, similar policies but at meal level, such as meal reformulation or menu labeling, were evaluated as very weak to non-existing overall. One exception here was the Brussels-Capital Region with a slightly more positive rating (weak to moderate). The Brussels government established the "Good Food Criteria," which restaurants could meet to obtain official recognition through the "Good Food Resto Label."

Policies on **food promotion, advertising, awareness and education** touch upon competences across the three governance levels. Policies restricting advertisements for unsustainable, unhealthy food were assessed very weak to weak for all jurisdictions across settings and media (broadcast media, public spaces, social media,...). This highly contrasts policies on active norm management through education and awareness campaigns, being generally rated as weak to moderate overall, and even moderate to strong for Flanders. The evidence report illustrates this by the Flemish Food Triangle, which integrates health and environmental sustainability, along with the information campaigns that build upon it.

With respect to **institutional catering and public procurement**, public policies were assessed notably more positively overall. Flanders and Wallonia performed best in this regard, with four indicators being rated as moderate to strong policies, and a slightly more intense score for Flanders. In both regions, policies related to food provision in schools were evaluated as strong. This underscores the strength of actions undertaken in Wallonia in light of the "Green Deal Cantines Durables" and its corresponding label in collective catering settings. In Flanders, notable examples include a commitment declaration for beverages and snacks in schools, a charter for healthy, balanced, and sustainable school meals, as well as various meal guidelines developed for catering in other public institutions. Finally, the evidence report also highlights the CFWB and its 2023 decree on the funding of free, healthy, and sustainable school meals.

Policies related to **zoning laws and in-store regulations** of food retail environments were evaluated as very weak overall. A notable exception is the Brussels Capital Region, with three indicators evaluated as weak to moderate. Through the Good Food 2 Strategy and the Good Food Resto Label, the BCR strongly focuses on promoting sustainable food chains, supporting and guiding entrepreneurs aligned with this vision, while simultaneously limiting (financial) support for food actors that do not adhere to these principles.

Fiscal policies within the federal governments' competence, were evaluated as very weak to weak. In 2015, an excise tax of €0.03 per liter was introduced on soft drinks, which is generally considered an insufficient measure. Additionally, the VAT system is not aligned with promoting healthier options, like fruits and vegetables. **With respect to subsidies supporting markets for sustainable, healthy food**, moderate policies were observed across the three regional governments (Flanders, Wallonia and Brussels). In this context, the Flemish Recovery Plan supporting the implementation of the Protein Strategy is worth mentioning, as well as the "VLIF", stimulating sustainable investments in agri- and horticulture. The Walloon Recovery Plan has also been financially supporting the production of local and sustainable food. Notably, most of these support actions, however, are targeted at production and not directly at consumption.

Table 3: Disaggregated Policy Mix Intensity per impact area and entity



Visible political support to improve food environments during the administrative period 2020 – 2024 was rated generally moderate, with the exception of weak ratings for the Brussels institutions (BCR, COCOF, VGC). Furthermore, **targets to improve population nutrition** were considered moderate for Flanders, Wallonia, DG and Federal. We reference the comprehensive Flemish health objectives outlined in the strategic plan “Flemish Live Healthier in 2025”. Also noteworthy are the objectives set by the DG, which, through their decree issued in January 2020, identified the reduction of red and processed meat, among other, as a key focus for health promotion. Measurable targets, however, were only observed in Flanders and Brussels. The Flemish Green Deal “Protein Shift on our plate”, aims to shift protein intake to a composition of 40% animal-based and 60% plant-based. Similarly, the Brussels Good Food 2 Strategy aims for 50% of its population being flexitarian and consuming alternative proteins like legumes on a weekly base by 2030. With respect to **evidence-based dietary guidelines**, the Flemish Food Triangle was evaluated as moderate to strong and could, based on their weaker evaluations, serve as inspiration for the other entities. Finally, both the Walloon- and Flemish governments developed **strategies and plans** that are considered moderately strong. This includes prominent strategies in Wallonia like “Food Wallonia”, “Manger Demain” and the Walloon Plan for Prevention and Health Promotion (WAPPS 2030). In Flanders, the comprehensive and cross departmental Go4Food strategy and related Protein Strategy should be mentioned. The weak ratings on these matters for the federal government and all other federated entities signal room for improvement.

A relatively high number of **monitoring activities** were identified, as reflected in the many “moderate” evaluations, particularly for Wallonia, Flanders, and DG. In terms of **monitoring nutrition status and consumption**, clear efforts are visible across all jurisdictions. The CFWB and DG perform notably well in this area (moderate to strong). For instance, the DG co-finances four different recurring studies on this issue focusing on children and schoolchildren (Jugendbericht, HBSC), as well as general population (Euregional Health Atlas, Food Consumption Survey). Notably, the Walloon government was rated “moderate to strong” for its policies on **monitoring inequality reduction**, including its effective monitoring through the Walloon Poverty Exit Plan and the Food Wallonia strategy, which supports data collection in food aid. Key institutions like OCWA, SPPIS, and IWEPS regularly assess the right to food and guide public actions, ensuring targeted support for vulnerable populations and improving decision-making in food assistance programs. Overall, significant room for improvement in monitoring was also identified, particularly in terms of structural and recurrent **monitoring of food environments, social norms, as well as the evaluation of food policies**.

Overall, the **coordination and platforms** described for the federal and regional levels were rated as moderate. In terms of transversal coordination within the same governments, Flanders and Wallonia perform relatively well. However, there is a noticeable difference with the community governments, which were rated rather weak in this regard. Therefore, strengthening both horizontal and vertical coordination in this context may be advisable, as will also become clear from the recommendations in the sections below.

Finally, we also consider integrated policy intensities by geographical region (Fig 4). In this integration, the evaluations of federal, regional and community levels were combined, taking into account division of competences. The highest policy mix intensity was observed in Flanders, followed by Ostbelgien, Wallonia and Brussels. It should be noted, however, that observed differences do not necessarily reflect the outperformance of single entities but could also reflect differences in complementarity between the federal, regional and community levels. This nuance is important when interpreting Fig 4.

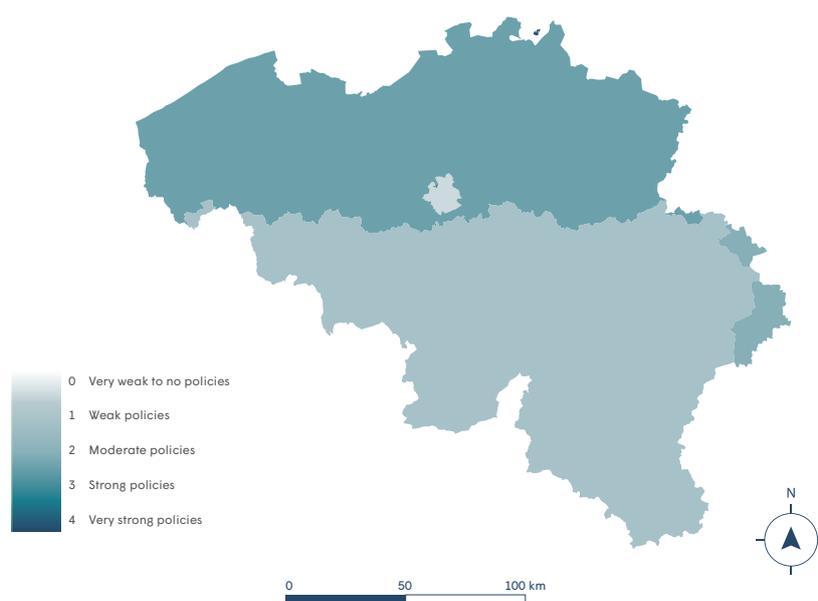


Figure 4: Aggregated Policy Mix Intensity

4.3 Six Policy Intervention Points for Sustainability Transitions

As can be observed in Fig 5, the most frequently targeted intervention points overall are niche stimulation (IP1), niche acceleration (IP2) and multi-actor coordination (IP5). Intervention points being visibly less targeted are regime destabilization (IP3) and the anticipation and management of broader transition repercussions (IP4). Lastly, the absence of actions at the landscape level is apparent (IP6) but will not be discussed further, as landscape changes primarily occur at the supranational level. The activities of Belgian negotiators at this level were beyond the scope of this study. Within this distribution of intervention points that constitute the integrated policy mix, some variation in terms of balance could be observed across federated entities. Like with the distribution of instruments, the federal state's policy mix was also most balanced in terms of intervention points (0.78), closely followed by the Brussels-Capital Region (0.77), Flanders (0.74), COCOF (0.72), Wallonia (0.70), DG (0.67), CFWB (0.62) and VGC (0.575). The number of actions was again not correlated with levels of balance.

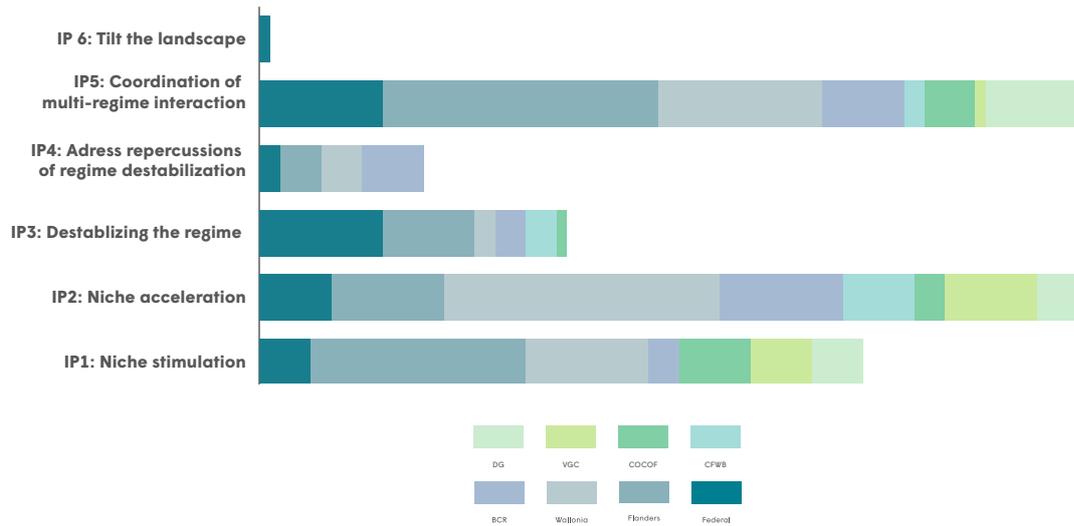


Figure 5: Aggregated number of actions per IP

First, we highlight **niches stimulating activities** (IP1), i.e. stimulating the emergence of diverse alternatives. These actions aim to foster the development of sustainable, healthy food products with the functional and sensory characteristics required to be competitive in terms of attractiveness. Besides the creation of experimental spaces for sustainable, healthy food, this IP also aims to transfer consumers knowledge and skills to adopt already existing alternatives ('mature niches'), like pulses, fruits and vegetables. In absolute terms, niche stimulation is being addressed most in Flanders (Fig 5). Some illustrative examples are subsidies for projects on novel protein development and for organizations offering workshops to schools on education to children related to food sustainability. In relative terms, niche stimulation takes up the largest share of the COCOF's activities (44%). This is illustrated by their funding of organizations that work on diabetes prevention through healthy food skills or organizations offering workshops on healthy and sustainable cooking in vulnerable neighbourhoods.

Second, we discuss the prominent amount of **niche accelerating activities** (IP2). The main aim of this intervention point is to scale-up and institutionalize sustainable, healthy products and practices. Therefore, it is worth highlighting that more actions are now targeted at acceleration, than stimulation of niches. In absolute (27) and relative (44%) terms, Wallonia showed notably high amount of niche acceleration activities. Illustrative efforts include the development of a regulatory framework for sustainable food in public procurement, as part of Food Wallonia strategy, the introduction of the Green Deal Cantine Durable Label, and the provision of free fruit, vegetables and healthy snacks in schools through various fundings schemes. In relative terms, acceleration holds the largest share of activities for the CFWB (58%). Per illustration, we highlight the financial support CFWB provides to organizations assisting health promoters in submitting requests for free advertising space, or drafting public procurement contracts for healthy and sustainable meals in children's community settings.

Activities targeting IP1 & IP2 - together considered '**phase-in policies**' - clearly constitute the majority of observed policy activities. With an even stronger focus on acceleration activities compared to stimulation, the food environment transition in Belgium could arguable be seen as entering its 'acceleration phase'. In this phase, it becomes crucial to actively deploy phase-down policies - weakening dominant structures perpetuating unsustainable, unhealthy food environments - to enable true acceleration.

Contrastingly, policies making unhealthy and unsustainable food products and practices less dominant - **phase-down policies (IP3)** - are deployed much less in the current policy mix. Compared to other entities, the federal government has been most active on this intervention point, both in absolute (12 instruments) and relative terms (31%), despite remaining very limited overall. Illustrative examples include refraining from allocating federal subsidies for promoting unsustainable, unhealthy food and the deontological guidelines of the Superior Health Council, which safeguard the policy advisory process from commercial influence. Note the consistent use of 'phase-down' policies rather than 'phase-out' policies in this report. Transitions in food environments (and by extension food systems) are multi-faceted, gradual and particularly characterized by a remaining co-occurrence of both (un)healthy and (un)sustainable products and practices ('reconfiguration').²² This doesn't mean phase-down policies are to be disregarded - on the contrary - they are generally considered as key intervention point to enable transition processes in food systems.^{22 23} Therefore, systematically incorporating a larger share of these activities in future policy mixes is strongly recommended.

Furthermore, deploying phase-down policies as part of a just transition, strongly requires **the anticipation and active management of potential socio-economic disruption (IP4)**.^{25 30} Activities addressing this intervention point in the current policy mix are even more limited. Illustrative examples from the Brussels Capital Region like offering programs to support public servants in complying to requirements on sustainable public procurement (Circular 05/0/2009), or training programs supporting collective caterers in their transition to sustainable practices (Good Food 2). Beyond labour readjustment and reskilling, structural measures such as the compensation of financial losses and unemployment might be needed to buffer between the current situation and the establishment of compelling alternatives.

Finally, the strong presence of **multi-actor coordination (IP5)** is notably reflected across all entities. For instance, strong cross-sectoral and cross-departmental collaboration is observed among the Flemish Departments ("Voedselwerven", "Voedselcoalitie", "Voedseldeals" etc.), as well as in the federal taskforces and "Ketenoverleg" and in the RAWAD network in Wallonia. This is beneficial to ensure complementarity between actors and to allow changes in one domain to easily overflow to other domains.^{23 31} The extensive monitoring and evaluation activities facilitate the alignment of policy activities, as well as input-output relations between actors. Finally, where Flanders, Wallonia and Brussels have strong developed strategies, there is also an urgent need here federally, as stated earlier.

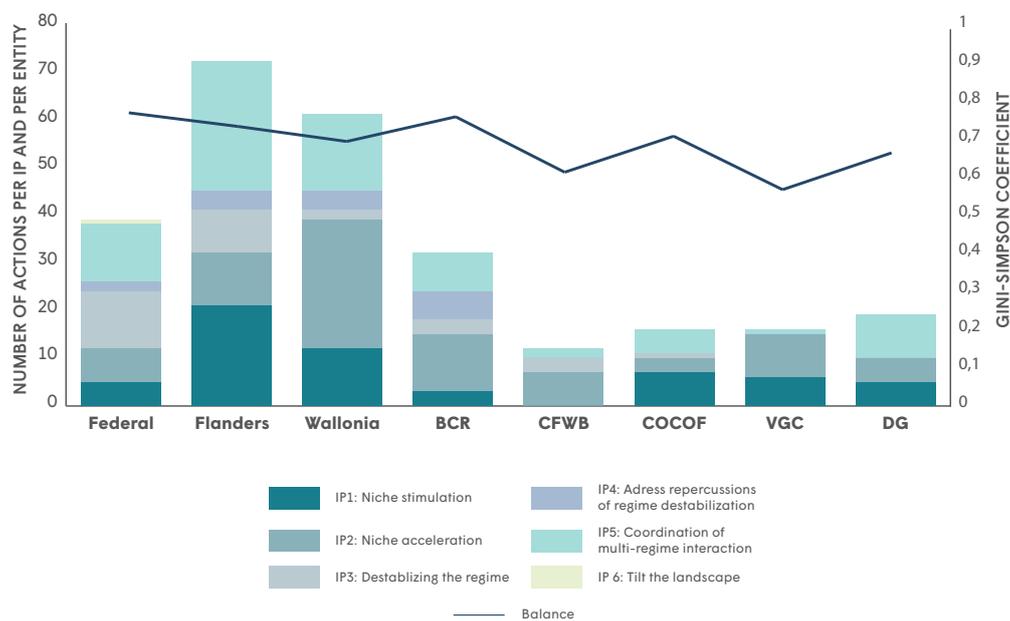


Figure 6: IP distribution per entity

4.4 Legal analysis of competence division

The legal analysis made clear that both the federal government and the subnational entities (the Regions and the Communities) hold relevant competences to implement actions promoting and creating sustainable, healthy food environments. A comprehensive overview of these competences is provided in Annex 3, where the various relevant competences are briefly explained. This overview demonstrates that the question of which government is competent will generally be determined by the framing of a specific measure. This could be illustrated by the example of promoting healthy food in schools. The regions may act within their competence in agriculture, as it concerns the promotion of local food. The communities, on the other hand, may rely on their competences in 'preventive healthcare,' 'social assistance,' and 'education.' Finally, the federal government could also find a legal basis within its competence over the 'regulation of food products.'

A second key finding concerns the competence regarding advertising for unhealthy and unsustainable food. The federal government has relevant competences under commercial practices law, as well as in the area of consumer protection against misleading advertising. Conversely, the communities remain competent regarding advertising on radio and television. However, as outlined in the detailed analysis in Annex 3, this does not apply to advertising related to federal competences, such as tobacco, alcohol, and food (as defined under the 1977 Food Law), nor to advertising on social media. The conclusion of the analysis in Annex 3 is therefore that the federal government holds the primary competence concerning advertising for unhealthy and unsustainable food, regardless of the channel through which it is disseminated.

4.5 Recommended actions

During the expert workshops, extensive discussions were held on the policy gaps identified through the compiled evidence documents and the intensity assessments reported in Table 3. A total of 158 recommended actions have been formulated, addressed to the federal government (43), Flemish government (53), Walloon government (14), Brussels Capital Regional government (27), French Communities - including both COCOF and CFWB - (21). Due to challenges with stakeholder participation, the German Community was unfortunately not covered during the workshops.

For recommendations that involve clear instruments and/or intervention points, an overview of their corresponding types is provided in Table 5. What stands out in these recommendations is that regulatory, economic, and informational instruments are much more balanced compared to the current policy mixes. The same applies, to some extent, to intervention points, with phase-down policies (IP3) appearing relatively more frequently among the recommendations than in the current policy mix.

At the same time, it is also notable that the anticipation of socio-economic disruption (IP4) caused by transition dynamics is hardly addressed in the recommended actions, just as in current policy mixes. It is therefore important to keep in mind that, in addition to the recommendations resulting from the workshops, addressing this intervention point remains a crucial factor in ensuring a competitive and fair transition. The fact that it was not explicitly raised does not diminish its importance.

In the body of this report, only a synopsis of prioritized recommendations is provided, along with a brief note on competence division based on the legal analysis where relevant. The full list of actions can be found in Annex 4.

Table 4: Number of recommended actions coded as instrument type(s) and intervention point(s)

	INSTRUMENTS			INTERVENTION POINTS					
	Regulatory	Economic	Informative	IP1	IP2	IP3	IP4	IP5	IP6
Federal	15 (37%)	6 (15%)	20 (49%)	6 (13%)	10 (21%)	13 (27%)	1 (2%)	16 (33%)	2 (4%)
Flanders	15 (35%)	12 (28%)	16 (37%)	3 (6%)	15 (28%)	9 (17%)	2 (4%)	23 (43%)	2 (4%)
Wallonia	4 (33%)	4 (33%)	4 (33%)	1 (7%)	8 (53%)	2 (13%)	1 (7%)	3 (20%)	0
BCR	9 (36%)	5 (20%)	11 (44%)	0	6 (22%)	11 (41%)	1 (4%)	8 (30%)	1 (4%)
Fr. Com.	8 (38%)	4 (19%)	9 (43%)	3 (13%)	5 (22%)	3 (13%)	1 (4%)	10 (43%)	1 (4%)

4.5.1 Federal government

Marketing Regulation in Public Spaces and Events: Develop regulations to limit or ban advertisements of unhealthy, unsustainable food in public spaces and at public events. This recommendation came up across all jurisdictions but is positioned here mainly at the federal level, following the legal analysis on competence divisions (Box 1). One proposal is to ban the advertising of products with a Nutri-Score of D or E. The initial focus is on children, but further examination of the impact on adolescents and adults is recommended. In line with this, another recommendation has also been formulated to impose the display of Nutri-Scores on food advertising but fell right below priority cut-off (see Annex 4).

Earmarking Fiscal Strategy for Promoting Healthy and Sustainable Food Choices: Implement a fiscal strategy that allocates revenues from taxes² on unhealthy and unsustainable foods to subsidies aimed at promoting healthy and sustainable alternatives. The implementation of such fiscal strategy could be supported by two aspects. On the one hand, this requires a robust and transparent communication strategy to ensure public understanding of the measure's overall goals and to mitigate resistance stemming from the tax itself. On the other hand, empowering individuals with the skills needed to respond to such a fiscal strategy by a more responsible dietary patterns are crucial to avoid a 'skill-biased taxation trap' or regressive taxation effects.

Consumer Price Index for Food Baskets: Establish a consumer price index comparing a representative basket of healthy, sustainable, and seasonal foods with a basket of less healthy and/or less sustainable foods. Monitor and analyze the discrepancy between the two indices to inform and align policy objectives. Additionally, this index can serve as a practical tool for public social welfare centers (OCMWs) to address the needs of vulnerable populations by aligning assistance with living wage standards.

Health and Sustainability Criteria for Public Procurement: Develop ambitious minimum criteria for health and sustainability in public procurement practices. Conduct studies to determine the scope and feasibility of broad implementation.

Regulate advertising on social media: Determine who holds responsibility under the division of competences to address advertising on social media. Once this competence is clarified, efforts should be directed towards establishing a covenant or regulation, moving away from self-regulation. A first attempt to unravel competences is provided by the authors below.

Healthy and Sustainable Food as a Fundamental Right in Article 23: Recognize healthy and sustainable food as a fundamental right, potentially integrating it into the constitution under Article 23. This principle would serve as a guiding framework that transcends the four-year governmental cycle and facilitates the alignment of shared objectives across various levels of governance and competence.

Overarching Strategic Plan: Develop an overarching strategic plan at the national, integrated, and inter-federal levels, addressing nutrition, health, sustainability, and inequalities. This plan should provide a cohesive and coordinated approach to tackle these interconnected challenges effectively.

Box 1: Note on competence division of recommended actions at federal level

Marketing Regulation in Public Spaces and Events – This is a federal competence, even for events falling under the competence of the federated entities (e.g., cultural or sporting events). The regulation of commercial advertising or marketing falls, in principle, within the federal competence regarding commercial practices law. The federal government is competent for "information aimed at promoting the sale of a product or service to the public, (...) regardless of the product or service to which it pertains" (Adv.Op. CoS no. 20.365/1)

Earmarking Fiscal Strategy for Promoting Healthy and Sustainable Food Choices – The fiscal distribution of competences follows its own logic, distinct from the 'ordinary' distribution of competences. Both the federal government and the federated entities generally have full competence to levy taxes, even on matters that fall under the material competence of another government. Federal priority applies: if the federal government imposes a tax on a matter, the federated entities can no longer do so.

For complete information: only fiscal measures (taxes, excise duties) fall within this system with the supremacy of the federal legislator. Non-fiscal measures (fines, fees, financial policy incentives) are not subject to this regime and can generally only be taken by the materially competent government. To be considered a fiscal measure, the measure must, in principle, primarily have a budgetary and fiscal purpose (i.e., benefiting the treasury), although taxes may certainly also aim to be 'behavioral' and, for example, serve health-related objectives.

Part two of the recommended dual approach needs to be considered carefully. The federal government must ensure that it does not encroach upon the competences of the communities regarding «health education, as well as activities and services in the field of preventive healthcare, along with all initiatives related to preventive healthcare.» (Article 5, §1, I, first paragraph, 8° SLRI)

² Similarly, VAT reductions on healthy sustainable food or VAT increases for unhealthy unsustainable food could be considered useful and falls exclusively within the federal competence.



Consumer Price Index for Food Baskets - The federal government holds general competence to regulate price and income policy in a general and uniform manner (Article 6, §1, VI, fifth paragraph, 3° SLRI). In contrast to this general price policy, there is a special price policy, which regulates prices and incomes in specific sectors in a targeted manner. Special price policy within federal competences falls under federal jurisdiction (e.g., arms policy), whereas special price policy within the competences of the federated entities pertains to the competences of the communities (e.g., culture) or the regions (e.g., agricultural products).

In the past, the federal government, when exercising its general competence over price and income policy, has broadly determined that the adjusted health index must be considered for wages, salaries, social benefits, allowances, premiums, and compensations in all statutory and regulatory provisions, in all provisions of individual and collective labour agreements, in all other agreements between employers and employees, and in all unilateral decisions by employers that provide for a link to a price index. According to the Council of State, this falls within the competence of the federal government.³

The federated entities may also, based on their special price policy, apply an indexing mechanism within their policy. Therefore, the federal government cannot regulate prices and incomes in a specific manner in areas that fall under the competences of the communities or regions.⁴

The determination of the amount of the living wage falls within the exception to federal competence for assistance to individuals.

Health and Sustainability Criteria for Public Procurement - The federal government has the competence to issue general rules regarding public procurement (Article 6, §1, VI, fourth paragraph, 1° SLRI). The federal competence over general rules on public procurement must be understood in conjunction with the competence of the communities and regions to issue supplementary rules on public procurement within matters that fall under their jurisdiction. Both the federal government, based on its general competence over public procurement, and the federated entities, based on their specific competences (e.g., preventive healthcare, agriculture, environment), can therefore develop criteria related to health and sustainability for public procurement.

Regulate advertising on social media - The regulation of commercial advertising or publicity generally falls under the federal competence for trade practices law. The federal government is competent regarding «information aimed at promoting the sale of a product or service to the public, (...) regardless of the product or service it concerns » (Adv.Op. CoS No. 20.365/1). However, the communities are competent to regulate commercial advertising on “audiovisual and auditory media services” (originally referring to radio and television). Conversely, the federal government retains residual competence over commercial advertising through “other forms of telecommunication.”

According to the Constitutional Court, the essential criteria for distinguishing media services (under community competence) from telecommunication (under federal competence) are: (1) the intended audience (for the general public? Yes, then media; No, then telecommunication) and (2) the nature of the information (public information? Yes, then media; No, then telecommunication). If a digital service has a “broadcasting function” (i.e., disseminating public information to the general public), it falls under community competence.

Thus, platforms such as Instagram, TikTok, YouTube, and other social media fall partly under the federal competence for telecommunication and partly under the community competence for media. This division makes it challenging to provide a definitive answer on who holds principal competence for regulating advertising on social media.

While communities are competent to regulate commercial advertising on radio and television, this competence does not permit them to enact legislative initiatives regarding advertisements for products or services that fall under matters for which the federal government is competent (e.g., tobacco advertising, alcohol advertising). The medium delivering the advertisement does not affect this competence (Constitutional Court No. 109/2000, October 31, 2000). Thus, although communities exercise competence over advertising on radio and television, they must respect the specific competences of the federal government in such matters (Adv.Op. CoS No. 20.083/8).

For example, the Council of State’s legislative division noted in Opinion 67.724/2/V6 that, despite their competences regarding audiovisual and auditory media services, communities are not competent to regulate the broadcasting of advertisements by publishers of audiovisual media services and providers of video platform services for products such as alcoholic beverages, weapons, cigarettes, and other tobacco products, including electronic cigarettes and their refills, or products containing glyphosate. These matters fall under the federal state’s competence.

From this, it appears that provisions regulating the advertising or sponsorship of harmful products (and unhealthy foods) to protect public health fall under the exclusive federal competence for the regulation of foodstuffs, even for advertisements broadcast via radio, television, or social media.

3 Adv.RvS nr. 57.195/1, 44; Adv.RvS nr. 57.332/1/VR, 6

4 Adv.RvS nr. 57.195/1, 43; Adv.RvS nr. 57.332/1/VR, 6.

4.5.2 Flanders

Support Implementation of Existing Frameworks and Capacity Building: Facilitate the implementation of existing strategic and operational frameworks across all relevant institutions by creating the necessary capacity to operationalize these frameworks effectively. This action addresses the observed challenge of translating well-established frameworks into practice, hindered by a lack of resources and practical guidance. Key settings identified for this intervention include educational facilities, municipalities (particularly smaller municipalities with limited budgets and project capacities), and care facilities.

Enhancing Food Literacy and Label Interpretation: Prioritize initiatives to improve food literacy and the interpretation of labels such as Nutri-Score. Critiques emphasize that current efforts often disproportionately target school-age populations, neglecting the need for such support across the entire life course. Expanding these programs to address all age groups is essential for fostering lifelong food literacy.

Development of a Legal Framework to regulate food environments for Local Governments: Create a legal framework empowering local governments to address and reform the design and layout of public spaces to promote healthier environments.

Integrating Healthy, Sustainable Food into Poverty Reduction Policies: Embed healthy and sustainable food initiatives within broader poverty reduction strategies. Ensure that vulnerable populations can purchase healthy and sustainable foods in mainstream locations such as supermarkets or workplace cafeterias, but at reduced prices. By avoiding reliance on parallel systems like food banks, this approach seeks to reduce stigma and promote inclusivity.

Establish a long-term vision Reflecting Clear and Deliberate Choices for Future Policies: Establish a long-term vision that reflects clear and deliberate choices. Be bold in setting ambitious, long-term objectives to guide future policies.

Develop a Toolkit for Cities and Municipalities: Create a practical toolkit tailored for cities and municipalities to support the implementation of effective food-related policies and initiatives.

Foster Greater Vertical Collaboration: Promote enhanced collaboration across governance levels and entities, positioning food as a transversal theme rather than adopting a siloed approach within specific policy domains.

Demonstrate Tangible Short-Term Benefits of Preventive Investments in Food Environments: Provide clear and tangible evidence of the short-term benefits of investments in preventive measures related to food environments. Examples include reductions in sick leave, increased productivity, decreased healthcare expenditures, and quickly measurable impacts such as retail product sales and reductions in advertising. This approach aims to counteract short-term thinking tied to political terms.

Box 2: Note on competence division of recommended actions Flemish government

Support Implementation of Existing Frameworks and Capacity Building - This seems to fall within the competences of the federated entities. It can either be based on the concrete implementation of material competences (education, local authorities, organization of healthcare institutions), or transversally within the competence for preventive healthcare.

Enhancing Food Literacy and Label Interpretation - Labelling itself falls under federal competence based on the competence for "product standards." Therefore, it will depend on which measures are being developed to achieve the objective of "improving food literacy". However, the Flemish Community can likely rely on its competence for «health education, as well as activities and services in the field of preventive healthcare, along with all initiatives related to preventive healthcare.» (Article 5, §1, 1, first paragraph, 8° SLRI) in order to promote the use of the Nutri-Score among the population.

Development of a Legal Framework to regulate food environments for Local Governments - In principle, this may be linked to the regional competence; however, this is a highly complex legal issue that extends well beyond the question of competence. Therefore, it is advisable to commission a more comprehensive study on this matter.

Integrating Healthy, Sustainable Food into Poverty Reduction Policies This - This action is certainly strongly linked to the communities' competence for providing assistance to individuals and the support that Public Centers for Social Welfare can offer to those in need.

4.5.3 Walloon Region

Support Sustainable Businesses and Initiatives Promoting Healthy and Sustainable Food: Provide support for the establishment, growth, and long-term sustainability of businesses and initiatives that promote healthy and sustainable food within specific territories.

Development of a Legal Framework to Regulate Food Environments for Local Governments: Facilitate the implementation of regulations to limit the establishment of certain types of food outlets (e.g., fast-food restaurants) in proximity to specific living environments, such as schools.

Promote Negotiated Pricing Policies Across the Food Supply Chain: Encourage negotiated pricing policies among stakeholders in the food supply chain to ensure food is healthy, sustainable, and provides fair remuneration to all actors involved.

Infrastructure support: To promote sustainable food practices, support actions, infrastructure, and logistics that facilitate retail trade. Ensure coherence between the various links in the food supply chain in providing support and subsidies.

Box 3: Note on competence division of recommended actions Walloon government

Support Sustainable Businesses and Initiatives Promoting Healthy and Sustainable Food - In principle, this can be linked to the regional competences for economic matters; however, this is a highly complex issue that extends well beyond the question of competence.

Regulation of the Establishment of Certain Types of Food Outlets - In principle, this can be linked to the regional competence for local governments. However, this is a highly complex issue that extends well beyond the question of competence division, analogous to what has earlier been mentioned for the Flemish government.

Promote Negotiated Pricing Policies Across the Food Supply Chain - The federal government is, in principle, competent for price and income policy, except for the regulation of prices in matters falling under the competences of the regions and communities (Article 6, § 1, VI, fifth paragraph, 3° SLRI). The provisions governing the federal government's general price policy are set forth in Book V, "Competition and Price Developments," of the Economic Law Code (CEL). By stipulating that the prices of goods and services are determined by free competition (Article V.2 CEL), with free price formation as the general rule, price regulation now plays only a residual role in economic policy. Nevertheless, in addition to this general competition principle, price control persists, based on the legal framework of Book V, Title 2 of the CEL.

Not only the communities and regions, but also the federal government, are competent to regulate prices within the scope of their substantive competences, to implement an effective policy. In such matters, the federal government is *mutatis mutandis* empowered to use specific price policy instruments, such as setting sector-specific or individual maximum prices, considering requests for price or margin increases, and requiring price notifications. For instance, the federal government determines the prices of pharmaceuticals and oil (Book V, Title 2 CEL) and can be considered competent to regulate the prices of foodstuffs (subject to compliance with higher European legal standards).

Within their competences for specific price policies in areas under their jurisdiction (e.g., agricultural policy), the regions can also adopt measures impacting the price of healthy food.



4.5.4 Brussels Capital Region

Ensure Public Funding Does Not Support Industries Producing Unhealthy and Unsustainable Foods: Establish safeguards to ensure that public funding for projects is not allocated to industries involved in the production of unhealthy and unsustainable foods.

Restrict the Marketing and Sponsorship of Unhealthy Foods and Alcohol at Public and Sporting Events: Ensure that events organized by public administrations, as well as sports events and clubs within the region, are free from the marketing of unhealthy foods and alcohol. Prohibit sponsorship from brands and companies associated with unhealthy or alcoholic products. However, it is important to note that this is no regional competence (see Box 4).

Expand the Criteria for the Good Food Label: Broaden the criteria for the existing Good Food label to include nutritional standards, such as prohibiting sugary drinks and limiting sugar content in foods

Interfederal coordination: Establish interfederal platform between regions and federal level in order to improve coherence across formulated and implemented policies.

Horizontal coordination: Establish platform for exchange on environmental and health policies between different jurisdictions in Brussels – the region BCR and communities, including also the COCOM.

Establish social security for food: Allocate a budget for healthy and sustainable food (with criteria for healthy and sustainable products) for everyone in the Brussels region.

Box 4: Note on competence division of recommended actions Brussels-Capital Region

Ensure Public Funding Does Not Support Industries Producing Unhealthy and Unsustainable Foods - This is possible for funding originating from the Brussels-Capital Region itself, as well as from local authorities (municipalities).

Restrict the Marketing and Sponsorship of Unhealthy Foods and Alcohol at Public and Sporting Events - Sport is within the competence of the communities. Therefore, it is the Flemish and French Communities that are competent for sports clubs and sporting events in Brussels. The Brussels-Capital Region cannot implement such restrictions. There are likely also overlaps with federal competence concerning advertising, or with the competence of the COCOM (Public Health and Social Affairs) for preventive healthcare and health promotion.

4.5.5 French community (COCOF & CFWB)

Shielding commercial influence in schools: More stringent regulations on commercial partnerships within educational institutions, particularly in areas such as catering and sponsorship.

Marketing restrictions events and sport clubs: Implementation of restrictions on advertisements, vending machines, and product sales (e.g., carbonated beverages, snack foods) during cultural events and within sports clubs frequented by children.

Overview and harmonization: Various initiatives exist across different entities focused on health and sustainability, albeit with limited budgets. It is essential to gain an overview of who is participating in which initiatives and develop a comprehensive vision for the entire population to promote a more coherent approach. This of course possible but requires close collaboration between the different entities.

Horizontal coordination: Clear and unambiguous collaboration/cooperation agreements between federated entities to facilitate coherent health promotion initiatives, analogous to existing frameworks for environmental and sustainable development cooperation among regional federated entities.

Free Healthy, Sustainable Meals in Schools and Kindergartens: The basic policy is to provide free, healthy and sustainable meals. If not possible for all schools, provide an intervention proportional to the school's SEI (Socio-Economic Index) (use the 1 to 20 scale for differentiated supervision). In addition, providing information to parents on these meals as an educational tool.

Impact Evaluation: Evaluate the impact of existing policies, which is rarely done, more rigorously. There is a lack of existing data to conduct such evaluations, as well as no assessment of the accessibility of programs for the entire population.

Financial Support Local Actors: Provide financial support to local stakeholders (territories, municipalities) to coordinate food-related actions (accessibility) and conduct assessments at the local level (through Food Policy Councils, food belts—funded by the Walloon government's environmental sector—promoting local products). Consider a broader approach to accessibility, including health.

Box 5: Note on competence division of recommended actions French Community

Shielding commercial influence in schools - The communities can utilize various competences to offer healthy food in schools (preventive healthcare, agriculture, poverty policy), and also focus on nutrition literacy within their curriculum. The extensive analysis is provided in Annex 3.

Marketing restrictions events and sport clubs - Advertising for food is, in principle, a federal competence, even at events that fall under the competences of the regions (e.g., cultural and sporting events). See also the analysis regarding Flemish competences. However, limiting soft drink vending machines would likely fall under the competence of the communities.

Free Healthy, Sustainable Meals in Schools and Kindergartens - This action is also possible in terms of competence division for COCOF and CFWB. For an elaborate analysis leading to this claim is being referred to earlier Annex 3.

Concluding Remarks

This report sheds light on the emergence of sustainable, healthy food environment policies in Belgium. The topic of food environments has been clearly put on the agenda, with increased recognition of the importance of more structural determinants of eating behaviors rather than a narrow focus on individuals only. Relatively intensive policy activities were observed across jurisdictions in terms of public procurement and norm management. Contrastingly, clear gaps remained as regards zoning laws and marketing regulations. Since elements of current policy mixes mainly consist of information-based and phase-in instruments, attention is also drawn to important remaining limitations. Subject to prevailing modes of governance and limited political priorities, targeted changes remain mainly incremental in nature and are much less substitutional and/or systemic. However, as this report demonstrates, a greater emphasis on regulatory and economic instruments is needed, with a stronger emphasis on phasing down unhealthy and unsustainable products and practices, yet in a just manner. Future approaches must therefore bridge divergent political agendas through multi-purpose policies. This report uncovered important building blocks towards further progress in this field.

First, with its widened lens and coverage of tools, this report broadens the scope beyond ideological and institutional signals in instruments. Contributing to this aim, the embedded legal analysis has demonstrated the strong potential of creative framing to link future policies to competences within jurisdictions. This should further navigate discussions from “what is constitutionally possible” to “what are we willing to do and how”. Besides highlighting the potential of competences that seemingly fall between jurisdictions, this report also offers several tailored and prioritised recommendations as inspiration for the future policy toolbox to render food environments more sustainable and healthier.

Second, although it might be tempting to further compare approaches between subnational entities, the observed congruence in formulated recommendations offer a more interesting perspective. For example, the unanimity across subnational entities on the importance of developing restrictive measures for advertising unsustainable unhealthy food was remarkable. The same holds for the need to develop legal instruments that allow local governments to establish zoning laws, as well as for the adapted use of eligibility criteria for subsidies to phase in or phase down business activities where appropriate. These are just a few illustrative examples that reflect the uncovered potential for better alignment of policy goals and corresponding means across regions, communities and federal level governments in future policy mixes. While being formulated based on individual needs of sub-national entities, such converging recommendations are useful for the development of a broader national vision and corresponding approach towards sustainable healthy food environments.

Third, it should be stressed that not single instruments, but properly aligned and balanced policy mixes are actual drivers of change. In line with this, the need for enhanced vertical and horizontal exchange and coordination was unequivocally expressed. More horizontal coordination should account for the increasing need to tackle nutrition and environmental sustainability jointly. While this is already being done more structurally in Flanders, the less streamlined institutional arrangements in Wallonia and Brussels would strongly benefit from this. More vertical coordination should go beyond increasing bilateral transparency on ongoing activities. When thoroughly taken up, this should stimulate the emergence of parallel activities in areas with common ground, enabling the development of a more unified national vision. The absence of a clear vision on consumption and food environments at European level, raises the need to establish a strong national ‘landscape’ by identifying converging needs and interventions through a more holistic and cross-competence strategy that is inter-federal. Through this report, we hope to have contributed to this integration by bringing public servants across jurisdictions together on the issue of food environments and further stimulate a clear and coherent national vision.

Finally, a transformative policy mix that drastically reduces health inequities, dietary risks and environmental harm, requires a bold yet just approach. On the one hand, this report recognizes that food system transitions involve a reconfiguration of relations between actors, including both new alternatives and established players. By emphasizing the importance of their co-existence, it aims to encourage a pragmatic and more deliberate management of changes in food environments. On the other hand, the report clearly states that it is primordial to consider diet-related chronic diseases and environmental degradation as societal problems which can be tackled together across and within government jurisdictions through a prioritized focus on creating healthy and environmentally sustainable food environments. Therefore, governments in Belgium need to take up further responsibility to address these environments through more far-reaching measures.

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