



Report on policy barriers and facilitators

Report **D7.1**



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Food systems that support transitions to hEalthy And Sustainable dieTs

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HISTORY OF CHANGES

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ACRONYMS AND ABBREVIATIONS

Table 2 *List of acronyms and abbreviations*

FAO	Food and Agriculture Organization of the United Nations
GDP	Gross domestic product
GHG	Greenhouse gas
EU	European Union
EC	European Commission
EP	European Parliament
CSO	Civil Society Organisation
NGO	Non Governmental Organisation
WP	Work Package
BMI	Body Mass Index

1 Introduction: why an analysis of power?

FEAST Task 7.2. aims to analyse policy barriers and facilitators that impede policy that can support healthier and more sustainable food systems, including the main stakeholders involved in these processes. The insights on these barriers, facilitators and stakeholders would be used to inform innovations that could help to improve our food systems. When the WP7 team began to discuss how to best approach this task, the first issue debated was that FEAST WP3 was already doing very similar work. In task 3.2, for example, WP3 is mapping government policies for healthy diets from sustainable food systems at local, national and EU levels. WP3 is also conducting semi-structured interviews with policymakers at different levels of jurisdiction (national and local), to assess barriers and facilitators to implementation of healthy diets from sustainable food systems. This work, together with the work on food companies (3.1) and vulnerable communities (3.2), will eventually feed into the policy labs organized in WP7. See [here](#) for an overview of the deliverables published by the two teams.

Given this work in WP3, the WP7 team reached an agreement to structure task 7.2 to complement, rather than replicate, what was already done not only in WP3 as well as WPs 4 and 5, which worked on co-designed community and technology based innovations to support the transition to healthier and more sustainable food systems. When we debated how to best complement the work of WPs 3-5, the focus went to why over the last few years, especially at EU level, policies aimed at fostering healthier and more sustainable food systems have been too often dismissed and/or watered down. This reflects a policy landscape where academic partners, CSOs and NGOs struggle to promote a health and sustainability agenda. Instead, private sector is much more effective in having their business-driven agenda promoted, while also managing to block policy implementation that would hinder their interests.

This reflects an imbalance in power between different policymakers that must be further investigated if we are to better understand how to maximise the impact of FEAST outputs and foster policy innovations that can deliver healthier and more sustainable food systems. For this reason, the WP7 team decided to investigate how decisions at different levels of governance - European, national and regional levels - are influenced by power dynamics between actors involved in the food system. If we are to identify how actors influence food system policies, we first need to determine if there are inequalities across stakeholders concerning who is more likely to influence which decisions are considered in the food system. As a result, the WP7 team decided to focus this deliverable on demonstrating how power distribution between food system stakeholders can serve as a barrier and/or facilitator to influence policymaking at different levels of governance.

To investigate power, we first need to define this concept. There are, of course, several definitions of power in the social sciences, but one of the most famous and widely used was given by Max Weber, who defined power as: "The probability that one actor within a social relationship will be in a position to carry out his own will despite resistance, regardless of the basis on which this probability rests." (Weber 1978; 53).

A thorough investigation of the concept of power exceeds the goals of this document. What is essential to specify is that power is not socially exercised in a unique form, but there are instead different forms of power. All these forms concern the fact that an agent X in some way affects another agent Y in a significant manner. This is an essential point for the purpose of this document, since this "in some way"

implies that power can be expressed in several forms. According to the famous categorisation by the sociologist Lukes, it is possible to identify three main forms of power (Lukes 2021):

The first form is '**Decision-making power**'. This is the form of power easiest to recognise, since it is the process whereby an actor, such as an individual or a political organisation, considers its situation and acts upon a course it has determined, either coercively or non-coercively. For example, I exercise this form of power if I put a gun to your head and I order you to give me your wallet. In this situation, you must do something you would not otherwise do if you do not wish to suffer worse consequences as compared to acting according to my demand. At the same time, this form of power does not have to be coercive. For example, voting is a way of expressing your decision-making power in a political arena.

This first form of power is the most common way of conceiving power and it has long been studied in political science (Dahl 1961). However, as stressed by Lukes and numerous others (Bacharach & Baratz 1970), if we considered only the first dimension of power, we would neglect that there are more subtle ways to exercise power. These other ways correspond to the second and third dimensions of power, and they are particularly relevant for the goals of WP7 and consequentially for this deliverable.

The second form of power is **agenda setting power**, which stresses that power is not just about making decisions, but also about setting the agenda that leads to decision-making. In other words, if you can control the context within which decisions are made, then you can influence those decisions. For example, if I control the terms of the discussion, I can frame the conversation so that participants are only able to discuss topics that are to my benefit, while also making sure that controversial topics are not discussed.

What is essential about this second form of power is that it stresses that power is not only about decisions, but also about *non-decisions*. That is, if I find myself in a decision-making process with other people, and I make sure that a certain decision X, which is contrary to my interest, is not discussed in the first place, then I have exercised a form of power. As we shall see, this form of power is very relevant when analysing food system policymaking.

The third form of power is **normative power** (Dowding 2006). Lukes describes it as the power to prevent conflict from arising in the first place, as it concerns societal practices and how these are shaped to favour certain groups over others. This is often referred to as ideological power, since a common belief is created and maintained to conceive such belief as the best and preferable option. Thus, this power is the ability of a group to shape the beliefs and preferences of another group against the real interests of the latter.¹

For example, Sen and Nussbaum stressed that in Bengal, millions were affected by the post 1944 famine, but out of all those involved, it was primarily men who reported to relief centres for aid, despite both sexes being similarly affected. This displayed a form of power that discriminated against

¹ We are aware of how problematic the concept of 'real interest' can be here, since determining from an external point of view which is the real interest of a certain group can sound mistaken and/or paternalistic. This will also need to be adapted to the food system to investigate whether we can define if groups, especially vulnerable ones, have real interests. According to Lukes (1991; 33): "What one may have here is a latent conflict, which consists in a contradiction between the interests of those exercising power and the real interests of those they exclude. These latter may not express or even be conscious of their interests, but, as I shall argue, the identification of those interests ultimately always rests on empirically supportable and refutable hypotheses."

women, since in accepting their ‘place’ of having limited rights in society, the women were not prepared to claim their rights to healthcare (Sen 1984).

The second and third dimensions of power are essential to understand why and how decisions are taken or not taken in a certain context. Moreover, a three-dimensional view of power helps in understanding the connection between power and responsibility for the change in a specific setting.

While the first dimension is too narrowly focused on individual behaviour, the second and third dimensions stress that there are many ways in which potential issues are kept out of politics, whether through the operation of social forces and institutional practices or through individuals’ decisions. For this reason, if we are to understand how power influences decision-making in a certain context – the “in some way” issue we started this section with – we must not just focus on the decisions that were taken, but also on the context in which these decisions were taken and that could have prevented other options not only from being taken, but also from being considered in the first place.

A difficulty with the second and third dimensions of power is that they are challenging to research. They do involve direct decision-making (which is easier to identify and analyse), but they often involve measuring a ‘non-decision’, namely a decision that could have been taken (or at least discussed) in a context with different conditions had this power not been exercised. In the literature, several strategies have been proposed to resolve this challenge,² but the one that has more potential for the scope of our deliverable is a Frame Analysis. As we explain in detail in the following sections, this methodology best matches our goal to analyse all the dimensions of power in FEAST and particularly how they can serve as barriers and facilitators to policy innovation that supports healthier and more sustainable food systems.

1.1 A Frame analysis for the three dimensions of power

The concept of frame was first developed by sociologist Erving Goffman (1974) to examine how humans construct, organize, and differentiate or contest possible meanings of their lived experiences. Frames may take different meanings, and, consequently, trigger different attitudes and opinions depending on which frame actors use. The goal of frame analysis is to understand how people come to a shared understanding of what they are dealing with and their situation (Brown 2013).

The term ‘frame’ may thus be considered similar to ‘narrative’. Yet, they should not be used interchangeably, since frames are actors’ perspectives, whereas narratives are the expressed products of those perspectives. Hence, a narrative is a story that may contain one or more frames, but goes beyond the notion of frame, while a frame is not a story, but could be identified in stories, or could use/include stories, or be transmitted through stories (Aukes et al. 2020). At the same time, frames may also be general, up to the point of shaping fundamental ontological beliefs including identity, e.g., regarding national imaginaries and belonging (Benford 2013).

Focusing on frames rather than narratives can thus offer more results, as the former allows to better identify story lines, taking cues from literary and media discourse analysis that are more suitable for in-depth qualitative research (Gadinger et al 2014). Furthermore, while narrative analyses have not

² Other methodologies include the Advocacy Policy Framework (ACF) (Olsson 2009), Social Construction and Policy Design (Pierce et al. 2014), and the Narrative Policy Framework (NPF) (Shanahan & Jones 2018). For reasons of space and time, we cannot analyse in detail all these alternatives, but we explain here below why a Frame Analysis is the one that best matches our goals.

often been done (despite the frequent use of the term ‘narrative’ in political discourse), frames have been amply used in policy analysis, as they allow to uncover and analyse the underlying structures, processes, and dynamics that shape power relations in society (Benford & Snow 2000).

Frame analysis allows researchers to better **understand** societal power structures. By analysing frames, researchers can identify and examine how individuals perceive and make sense of the world, thus gaining insights into the power structures that influence social interactions and decision-making processes. Having understood power dynamics, it can then be revealed how frames are **constructed**, **maintained**, and **contested**. This is central from a power perspective, since the analysis can reveal how certain groups or institutions establish and reinforce their power through framing, while also shedding light on how other groups challenge and contest dominant frames to challenge power imbalances.

As aforementioned, power has dimensions that are not immediately manifest in decision-making, so frames can help reveal the hidden assumptions dominating at societal level. Frames are never neutral, but they instead reflect underlying assumptions, values, and ideologies, thus a frame analysis can help to uncover the often implicit assumptions within frames, making visible the power interests that underpin them. In this way, it is possible to stress that power operates not only through physical force, but also through discursive practices, social norms, historical legacies, and cultural beliefs. Therefore, by considering these contextual factors, a frame analysis provides a more nuanced understanding of power and its manifestations.

This is particularly relevant for the purpose of the WP7 analysis because how actors construct and use frames in a specific setting - in our case it will be in the food system - is influenced by power dynamics. That is, various stakeholders use frames strategically to shape the beliefs and preferences of other groups to make sure that the option they favour will eventually be selected as the main frame to conceive the selected topic. Translated into policymaking, this means that if a group manages to have its own framing considered as primary by policymakers, then the latter will take decisions that reflect such framing, while simultaneously excluding other options from being considered. In turn, this has a major effect on the policies that are eventually implemented.

In the promotion of their frames, not all stakeholders have the same power. Certain groups – for example vulnerable populations in a specific area³ – are in a structurally weak position and lack resources for deliberately accommodating frames. Furthermore, not only do they act in a context where they have not contributed to developing the frame accepted as ‘the right one; they also do not have the instruments necessary to appropriate existing alternative frames, for which reason such frames remain marginal to political debates, and the food systems debate in our case.

On top of that, frames could be deployed strategically depending on the issue at stake, the audience, context, etc. For example, in the debate on welfare and social benefits, using two different frames can lead to very different consequences. On the one side, if one frames the social transfer beneficiaries as lazy, inactive, undeserving, etc., the attitude triggered and opinion delivered will be more inclined towards punishing one individual for his/her own condition. Consequentially, there will be less public willingness to offer help to those in need of receiving the social transfer. On the other side, a frame

³ In the food system, children can be an example of vulnerable groups who are exposed to other groups’ frames, and who are unable to develop their own frames to counteract the influence of dominant frames. The focus on protecting children from advertisements of unhealthy food is one concrete example of how this frame imbalance could take shape in the food system.

that depicts beneficiaries of social policies as hit by bad luck, or hard working, unrecognized single mothers, etc., is more likely to trigger emphatic responses regarding social transfers.

The difference between these two frames is relevant because it is closely connected to the responsibility to address a specific issue. In the example just presented, the first frame focuses on individual behaviour, stressing that the cause of the problem is that certain individuals have bad qualities (lazy, inactive, etc.) and miss good ones (proactive, laborious, etc.). If you then behave badly (in this case you do not have a job), it is your responsibility to resolve the issue because it is just about you changing your attitude and transitioning towards a positive behaviour.

On the contrary, the second frame stresses that unemployment is the externality of a poorly structured socioeconomic system. In this frame, the issue is not whether the unemployed individual has good or bad personal qualities, since it is instead more relevant that this individual may suffer due to systemic problems that are outside their control. Here, the responsibility of a change is no longer on the individual, but it is systemic, since it becomes a societal responsibility to fix the socioeconomic problems that eventually lead to higher rates of unemployment.

In summary, how we frame a debate is unavoidably linked to where we think the responsibility to find a solution lies. In settings where the dichotomous individual/systemic responsibility is of primary importance, as is the case with food system policies, finding how different stakeholders frame the issue becomes central.

In most cases, frame analysis is facilitated by the fact that, usually, one specific actor engaging in a certain political debate will promote one specific frame regarding the issue at hand. However, this should only be taken as a rule of thumb, since there may be cases where actors are promoting different frames on the same issue depending on audiences and other factors. To this end, a frame analysis can provide knowledge on:

- I. Which frames are relevant for the transition to healthier and more sustainable food systems.
- II. How these frames influence FEAST activities and goals, namely how they allow the consortium to promote a certain action, or how they impede not only taking a specific action, but also to render a certain topic an issue that ought to be debated in public fora. Here, there is a direct reference to Lukes's third dimension of power, since different stakeholders compete to define the main frame to be used in the analysis of food systems (Knezevic 2021).
- III. How to develop counter-frames, as a form of facilitator and innovation, to confront frames currently hindering the transition to healthier and more sustainable food systems. By elaborating or adopting innovative counter-frames, it could be possible to reconfigure frame landscapes so that these are more likely to support, rather than hinder, the transition to healthier and more sustainable food systems. The development of innovative counter-frames is connected to the Gramscian notions of hegemony, sub-hegemony, and counter-hegemony (Donoghue 2018).
- IV. The role played by what Gramsci called 'organic intellectuals', namely the individuals whose role is precisely to work out how frames influence the dynamics of the group of belonging. While vulnerable groups lack a sufficient amount of these 'organic intellectuals', certain actors, such as bigger food industries, can use their economic power to enrol organic intellectuals that use their capabilities to spread and reinforce those frames that are most compatible with the interests of their employers or those that they feel affiliated with (Slothuus 2021).

From what is described above, it follows that we structure this work on one specific assumption: frames are significant barriers and/or facilitators to innovative policy implementation. Certain actors use them

strategically to hinder the implementation of policies that go against their interests, while they promote other frames that are likely to promote policies favouring such interests. In the cases studied, it also emerged clearly which actors were using frames to hinder policies focused on healthier and more sustainable food systems, and which instead were trying to promote them.

Therefore, in what follows, frames developed by industries that are considered to be obstacles to policy implementation for the transition to healthier and more sustainable food systems are presented – these are considered as barriers. In contrast, counter-frames will be considered the innovation that could be used by CSOs, NGOs and relevant policymakers to promote policies favourable to healthier and more sustainable food systems. Studies on framing are abundant in the literature, but the research into how influential framing can be at policy level is still scarce. In this way, we address the goals of this first deliverable in WP7, given that the counter-frames described at the end of each chapter can be considered innovative facilitators to FEAST's goal of supporting the transition to healthier and more sustainable food systems.

This helps also to address one of the other key points mentioned in the description of our deliverable, namely that public health interventions can promote a *balanced intervention ladder*. Over the last decades, neoliberal ideologies promoted the idea that state interventions are an unnecessary hindrance, especially in the economic framework, that should be limited in order to grant individuals' liberty. This view takes to the extreme a conception of liberty as non-interference, for which the less an individual is interfered in their life by other actors, the more freedom they enjoy (Pettit 1999).

The debate on the political consequences of the different conceptions of liberty is outside the scope of this report, but what is essential to consider is that the neoliberal ideology frames public bodies' intervention in a negative way. In so doing, public measures are no longer conceived as an essential measure to grant public health and tackle social inequalities, but as something to be limited. However, this view neglects that social systems will have to address the significant health inequalities that result if there are no policies to support those least better off.

On the contrary, there are other views of freedom, such as freedom as non-domination (Pettit 2012), for which state interference is not only acceptable, but necessary to grant individuals' freedom. In such a framework, public health interventions and other social policies are not only acceptable, but required to ensure that all individuals can equally enjoy their basic rights, and in this case their right to a healthier and more sustainable food system. Therefore, the counter-frames presented below are not only innovations that could favour better food systems, but can be presented as necessary interventions to grant that food systems are fairer and more equal and equitable.

1.2 Frame Analysis methodology

Being a conceptual device allowing to understand how power operates, frames are ideal types that in reality may hybridize or often appear in truncated forms. Usually, a frame is not expressed in toto in most political documents or other texts, but it serves as an implicit ordering device connecting different statements in view of social coordination and the enforcement of certain interests. In the simplest version, frames can be analysed by deductive coding, using inductive sub-codes for distinguishing relevant categories within major frame dimensions. To do so, it is necessary to go through a three-step procedure:

1. **The diagnostical dimension constructing the issue at hand:** the issue that shall be investigated has to be defined and relevant texts have to be collected in a systematic way;

2. **The prognostic dimension referring to the solution of the problem:** relevant text has to be coded according to diagnostic, prognostic and motivational components;

3. **The motivational dimension** indicating benefits of the solution and further reasons to engage politically have to be clustered.

To encompass these dimensions into the research, the WP7 research team conducted a media analysis to understand how frames enter public discourse. Analysis focused on websites, press releases, policy documents, etc. that spoke about the selected topics to then identify how frames are being produced. For frames to properly reflect the view of the selected stakeholder, it is essential that the quote or statement is **direct**, and not an indirect reference about what others have said. The main aim of the analysis was thus to select the direct quotes in the sources that were found. This needs to be considered when reading the following sections, as some quotes may include grammar errors or inaccuracies. This is because English may not be the first language of the speaker and/or because the quote is taken from an oral discussion and could thus sound imprecise when put into text.

Some topics concerned EU level discussions, so the journals and media identified were in English language. For some of the local level debates, sources were in the local language, and thus had to be translated. Usually, direct interviews are a good way to complement the media analysis, but for this work we only relied on sources found online. Interviews are time and resources consuming, and all cases identified already offered a significant richness of information, so we decided to invest all the resources into collecting as many frames as possible from the available media.

While this introduction uses a 'classic' reference style, to facilitate the reading of the chapters, we decided to **use hyperlinks to reference the quote before each of the frames presented**. This makes the text easier to follow, and offers the opportunity to the reader to read/watch more about it in case a specific frame catches their attention. To ensure that sources are maintained over time, as some online media can be removed/changed, we also took and collected screenshots of the sources. These can be provided upon request by the research team if in the future some of the sources are no longer available.

Given the richness of the data collected, the frames presented in the following chapters are the ones we decided, upon agreement between the researchers, as being more indicative of the views of different stakeholders, and the ones that better reflect the differences between the different views. An important aspect to note is that for frames to emerge clearly it is preferable to identify a situation of conflict. These are particularly interesting, since in this situation, it emerges more clearly what is most relevant and most at stake for actors involved, which are the discursive frontlines and strategies deployed and finally, what the conflict is actually about (Giménez & Shattuck 2011).

If frames are strategically used to slow down or prevent change towards healthier and more sustainable food systems, then they represent a significant barrier to better food system policies. By applying the frame analysis to all the dimensions of power, we can thus analyse the frames affecting European, National and regional food systems, and how these are favouring certain positions and demands, and related actors (as well as policy processes) over others.

Given limited time and resources, the main challenge was to precisely define the target and level of the analysis. WP7 research team eventually decided to focus on four topics. These have been selected due their relevance in the food policy debates of the past few years, and due to their contentious

nature, which led several stakeholders to reveal their different framings of the issue. The four topics selected, and that will be described in the following chapters were:

1. **The obesity drug Wegovy:** Novo Nordisk pharmaceutical company dominated the obesity discussion over the last few years with their recent drug, and its claimed ability to reduce obesity rates.
2. **Nutri-Score discussion during the Farm to Fork strategy:** one of the key points of the EU strategy Farm to Fork was the adoption of a mandatory and uniform front of package nutritional label. The Nutri-Score was the primary candidate, and its possible adoption started a heated debate at EU and national level.
3. **Pesticide Regulation during the Farm to Fork Strategy:** another point of this strategy was the regulation of the pesticides currently in use in Europe. This also sparked a debate between supporters of further regulations, and those opposing them.
4. **Zoning Laws:** municipalities around Europe have limited legislative resources to control the food environments in their local area. We analysed four case studies (Florence, Wicklow, Tervuren, and some cities in the Netherlands) to describe how stakeholders framed this debate.

For each of topic, we analysed how relevant stakeholders framed the debate. The lines between different stakeholders are never perfect as it is at times difficult to say 'who is what', but for the sake of the research we identified four macro-categories of stakeholders:

- I. **Governmental Institutions:** frames used by the European institutions, Member States and/or Regional institutions and policymakers;
- II. **Food Industries:** these will concern either the single specific company, or the organisation representing a specific sector;
- III. **CSOs/NGOs:** these include non-governmental organizations at different levels of governance;
- IV. **Academic Institutions:** universities and public research centres.

The frames used by these stakeholders were analysed and compared with one another. The goal of this procedure was to define the frames that are serving as barriers to the transitions to healthier and more sustainable food systems, and which are facilitating such a transition. Of particular importance was the comparison between the 'official' frame used by governmental institutions and those of the other stakeholders, since the more a frame corresponds to the official version, the more it means that this frame has managed to be accepted as the primary one in the food system setting, and vice versa. That is, if governments use frames developed by the industries, then it means the latter has successfully disseminated their frames and imposed their view in the 'policy arena' over the other stakeholders.

After this comparison was completed, the final goal of the frame analysis was to produce a toolbox that policymakers and stakeholders can use to not only understand in more detail the different frames affecting food system policies, but also to deconstruct the problematic frame and provide concrete and innovative alternatives to replace such frames. To (over) simplify this concept, a counter-frame can be conceived as a 'how to respond to the frame' manual.

1.3 Framing affects policy implementation and policymakers must better learn how to navigate the various frames

Food systems are complex and it is too often neglected that topics and concepts involved may not be conceived in the same way by all actors involved. Different stakeholders use different definitions of even the most fundamental concepts (because they are crucial for how frames are constructed that relate to more narrowly defined issues) – e.g., sustainability, food security, health, etc. – and these differences may slow down policy implementation and may impede policy formulation. On top of this, how frames are used are unavoidably connected to stakeholders' interests, which of course differ from one another, so each group will try to use their power to make sure that their preferred frame becomes the dominant one in the setting considered (food system policies in our case). For this reason, the development of the frame analysis will be essential to understand how power shapes food system debates at different governance levels.

Furthermore, since power and prominence of frames correspond with each other, it is important to understand how actors that have been so far marginalised – small producers, local farmers, certain groups of citizens, and in particular vulnerable groups – can propose counter-frames to the conceptualizations that have so far managed to dominate food system debates and have often not been conducive to sustainability and public health. A policy toolbox could provide those citizens and policymakers that are willing to transition to healthier and more sustainable food systems with the means to counteract those frames that are currently slowing down this process, and to replace them with alternative counter-frames more compatible with the goal of transitioning to healthier and more sustainable food systems, a goal shared with the FEAST consortium.

Finally, but very importantly, the FEAST WP7 structure can offer a platform to test the efficacy of innovative counter-frames proposed or identified, since some of the policy dialogues could be used as trainings where policymakers learn to identify hindering frames and to respond with the counter-frames provided by the task 7.2. analysis. In this way, task 7.2. can contribute to the work carried out by all FEAST WPs, while also inspiring future EU funded projects to analyse how the more subtle dynamics of power influence the debates over food system policies.

2 A silver bullet to resolve the obesity epidemic or an expensive waste of resources?

An analysis of how different stakeholders are reacting to Wegovy, the drug that according to Novo Nordisk finally promises to resolve ever increasing obesity rates

2.1 Introduction

From a public health perspective, one of the major problems of European food systems is that they are leading causes of overweight and obesity, with *now more than 1 in 2 European that are overweight*, and more than 1 in 6 that are obese (OECD 2019). These percentages are worrying as overweight and obesity are leading causes of several Non communicable diseases (NCDs), such as cardiovascular diseases, type-2 diabetes, and certain cancers. Moreover, obesity has a serious economic burden in Europe, with the total cost of adult obesity in the EU – considered as healthcare costs and lost productivity - *estimated at in excess of 70 billion Euro per year*.

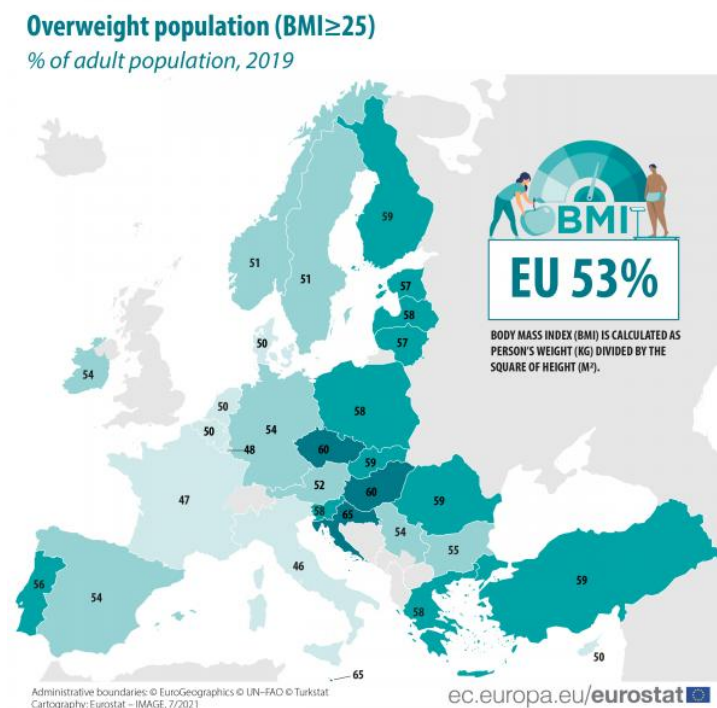


Figure 1 Eurostat Overweight population (%) in Europe

An aspect particularly problematic about being overweight and obesity is that we have not yet been able to reverse and neither to slow down the increasing trend at population level. On the contrary, *worldwide adult obesity has more than doubled since 1990, and adolescent obesity has quadrupled*.

The causes of this currently unstoppable trend are obviously complex and exceed the purpose of this analysis. However, for our focus on the framing of food system debates, something extremely interesting has occurred over the last couple of years. The Danish company **Novo Nordisk** has released a new obesity drug called **Wegovy**, which efficiency seems to be higher as never before. More recently, the company **Eli Lilly** – a long-term competitor of Novo Nordisk in the market of diabetes drugs – has also released a drug called **Zepbound**, which has proven similar potential to Wegovy. In what follows,

we describe some of the most relevant frames used by different stakeholders related to Wegovy but, as we will specify, some data will also pertain to Zepbound.

In a nutshell, Wegovy is based on an active substance called semaglutide, which is a glucagon-like peptide 1 (GLP-1) receptor agonist. Wegovy contains the same active ingredient – semaglutide – as the anti-diabetic drug **Ozempic**. Novo Nordisk discovered that this substance mimics the action of a natural hormone in the body with the power to regulate the person's appetite. In short, **Wegovy can increase a person's feelings of fullness**. This, in turn, can reduce the hunger and cravings of food in the person with overweight or obesity, thus decreasing the food intake and, in turn, leading to weight loss.

The treatment requires injecting under the skin once a week a pre-filled pen containing a solution. To reduce the risk of gastrointestinal issues, the treatment starts with a lower dose, and it then gradually increases over 16 weeks. Patients can administer the medicine themselves, and the medicine can only be obtained with a prescription.

Currently, Wegovy is indicated for individuals who have a **BMI** of 30 kg/m² or greater (obesity), or of at least 27 kg/m² but less than 30 kg/m² (overweight) who have weight-related health problems (such as diabetes, high blood pressure, etc.). It is also used in adolescents from 12 years of age whose BMI is at or above the 95th percentile for their age and gender (obesity) and who weigh more than 60 kg. As of early 2025, in Europe, weight loss drug Wegovy has only launched in **Denmark, Norway, Germany and the U.K.** Outside Europe, it's available in the U.S.⁴

There are two important details related to this medication. *First*, that it still needs to be accompanied by a low-calorie diet and increased activity physical for weight management. Second, that it requires a chronic treatment to be effective. This means that once you start taking this drug, you need to continue taking it ideally for the rest of your life. Otherwise, *there is a rebound effect* for which hunger will come back and patients are likely to gain back weight.

Over the past decades, several drugs were publicised as a way to lose weight, but none had managed to demonstrate its effectiveness over a long period of time. Conversely, after *several studies* published in scientific journals backed-up the results of Wegovy, this drug rapidly increased its popularity, shortly booming both in the healthcare, economic, and public sphere. In the second half of 2023, this success increased even further, after other studies proved that this drug could also lead to *improvements in heart-related problems in those taking the drug*. Such has been the success of the Wegovy drug, that Novo Nordisk's share price has more than quadrupled in the past five years, making it Europe's most *valuable* company by market capitalisation.

Following these recent developments, it is easy to understand the hype on this drug. However, other stakeholders involved in this discussion are stressing that it is not all gold what glitters, and there may be several issues with this drug. To better understand this debate, we analysed these main points of contention, looking at how the main stakeholders framed their point of view regarding this.

We start presenting the pros and cons of the Wegovy drug according to different stakeholders, which helps displaying that there are both supporters and sceptics about the real efficiency of this drug. These two views on the drug lead to two main framings of the debate. On the one side, there is the **solution**

⁴ <https://www.ema.europa.eu/en/medicines/human/EPAR/wegovy>

framework proposed by Novo Nordisk. On the other side, sceptics stress that this is not a solution to a problem that is instead much more complex and **involve the whole food environment**.

These two views lead to different framings of the debate. In the second section, we present how people living with obesity are framed in the debate, underlining that there are not many differences between stakeholders in this regard. All entities involved maintain the need to move away from a stigma for which obese have only themselves to blame, to stress instead that causes for these increasing obesity rates are to be found somewhere else. However, when the question “why is there a high prevalence of overweight and obesity in the European population?” is asked, responses differ.

In the third section, we describe the responses to this question given by the two framings of the debate, explaining how there is an evident difference between a frame focused on the individual (Novo Nordisk’s one) and one that addresses instead the systemic determinants of obesity. In section four, we present how the two framings affect the public debating, stressing in particular how each framing leads to consider certain topics rather than others, and how this influences also the solutions foreseen to resolve the problem. Finally, we describe a series of counter-frames that could be used by stakeholders to counteract the individual responsibility frames and favour instead framings based on a systemic responsibility.

2.2 The Wegovy drug: is it all gold what glitters?

Such has been the impact of the Wegovy drug over the last couple of years, that we could almost say that our societies have been hit by a “Wegovy storm”. This “storm” has created two sides. On the one hand, those who strongly support the widespread usage of this drug. On the other hand, some have been more cautious and are warning about the problems with the widespread use of semaglutide drugs. In this section, we provide a short overview of the main points of contention, as these are the basis of the different frames described in the following sections.

2.2.1 It does glitter!

Starting with those stressing the benefits of semaglutide drugs, Novo Nordisk themselves argue that Wegovy could offer individual and societal benefits. Starting point of this argument is, according to *Novo Nordisk’s CEO Lard Fruergaard*, the need to recognise obesity as a disease. This can help understanding that obesity must be treated by means of a drug, thus helping all those patients that have unsuccessfully tried so far to lose weight.

It is not just about the individual though, as there are benefits also for society. This is because obesity has a well-acknowledged economic impact on society in terms of direct costs to treat the related diseases (aforementioned NCDs), but also indirect costs, such as the fact that obesity is reducing the number of active people in the workforce. *According to Novo Nordisk then*, this is the medical intervention with the potential to have the largest return to society in history.

Novo Nordisk’s thesis has received support by several other experts throughout Europe. Overall, those in favour of Wegovy *stress that* the demand for this drug is an indication that obesity is a significant problem in all welfare societies, and that people perceive it as a problem. In particular, it seems that within medicine, and in particular within bariatric medicine there is a consensus that this drug is *a real*

breakthrough that can improve quality of patients' life, especially if *used alongside a weight management programme including diet and exercise*.

This group shares Novo Nordisk claim that we need to consider obesity as a medical condition, since conceiving it as a disease can help to cure the pathology by means of a drug. *As stressed by a lecturer in physiology:*

"Effective and long-term support with losing weight with Wegovy, the results of which are unattainable for most people living with obesity to achieve through diet and exercise alone, results in significant improvements in health outcomes."

For this view then, **recognising obesity as a disease** is a necessary precondition to allow the healthcare system to treat the problem by means of a drug. The chronic aspect of the treatment still raises some concerns in several countries. Yet, it is indicative that some agencies of medicines still stress the value of the medicament despite these concerns. For example, the *Spanish Medicines Agency assessed that* this is still the best solution to treat obesity or overweight, despite the reluctance of the long-term use of the drug. *As stressed by other doctors*, in the short term the expenses for the treatment may **put a strain on the public health system**, but given that obesity is the gateway to more than 200 cardiovascular diseases and problems, **in the long run Wegovy will alleviate what is now** a major *economic burden for countries health expenditure*.

The success of the Wegovy has not been limited to the healthcare system. On the contrary, this success has resonated also socially, such that the *'Wegovy frenzy'* has hit also the show business. *Some now call it* the 'Hollywood drug', with *doctors confirming that* other than Viagra and Botox, no other medication has *so quickly become part of modern culture's social vernacular*. This popularity can also *be seen on social media*, where TikTok videos tagged with #Ozempic have racked up more than 600 million views. In these platforms, influencers promote this drug by showing how much thinner they are, and *claiming that* they did so without the need for any exercise, as they 'just' had to inject themselves with the drug.

The usage of Wegovy in this context has come under a lot of scrutiny, since the drug is used for a different purpose than the one it was conceived for. That is, Wegovy is meant to be used by those living with obesity or overweight, while here it is mainly used to lose some weight to achieve an appealing physical appearance. This is also confirmed by the discussions around the *"Ozempic face"*, which is the concern about the fact that the face skin of those who have taken this drug may look saggy due to the excessively fast weight loss.

The fact that celebrities are abusing this drug not for health reasons, but to achieve an ideal figure, has sparked a controversy also because it could amplify the cultural desire for thinness that is already dominating the fashion landscape. Consequently, this could set a bad example for youth that are already so vulnerable to the unrealistically filtered versions of beauty.

The celebrity misuse of the weight-loss drug is not the only criticism that has been raised towards the Wegovy drug. As described below, other voices question its actual efficiency and feasibility as a large-scale public health intervention.

2.2.2 No, it does not glitter

From the beginning, the results of the Wegovy drug have been accompanied by doubts concerning *the side effects of this drug*. The most common concern nausea and stomach issues, but they also include possible thyroid tumours and, the most debated, an increase in depression and suicidal thoughts. The discussion on the side effects is ongoing and to determine whether they are true pertains to thorough medical research, so it is not the main focus of the frame analysis. For the time being, while there are still several concerns regarding some side effects of the drug, *research* seems to have proved that there is no connection between the drug and an *increased tendency to commit suicide*.

Aside from the side effects, a point of contention concerns the **availability of the drug**. Given that the demand for the drug has skyrocketed (more of this in what follows), there may now be an availability problem with the medications for diabetes. That is, Wegovy and Ozempic are based on the same substance (semaglutide), so *there are concerns that* the medicine could go into a supply crisis because it has been used for people who do not have diabetes. Therefore, *in several countries*, those protecting the rights of people with diabetes are concerned that this *rush on the obesity drug* could cause *availability problems* for those living with diabetes.

More in detail, there is the risk that by making it easy to buy these drugs, they may be used improperly by people who are not those most in need. For example, there could be *a situation* where those with diabetes are not able to get the drug because it has been used by many people who want to simply lose a bit of weight before the holidays. *For some doctors*, it is then necessary to address how social media and the culture of getting slim is affecting people's demand for this drug, so that we make sure that only those who really need them – those with a very high BMI – access them. Otherwise, this could create inequalities in health.

Another criticism to Wegovy concerns the excessive level of aggression with which it has been marketed. Therefore, some are trying to **slow down the enthusiasm for this drug and the perception that it could be a 'miracle drug'**, *to stress instead that* its prescription must be properly framed, that it must be sold only under the strictest possible conditions, and always be accompanied by comprehensive care and alongside other weight loss measures. Also, by focusing too narrowly on hunger, it *may be forgotten that*:

"A big part of why we eat isn't necessarily hunger, it might be physiological anxiety, depression, low mood, boredom, ritual, so if you are not making those changes as well, you are not going to lose weight in the same way".

On top of this, there is a concern that proposing Wegovy as an easy solution may deceive people living with obesity, making them forget that as for other chronic diseases, **getting to healthy ways is a long-term process** that requires repeated appointments and a lot of support. Therefore, *there is the risk that* by seeing this medicine as a 'quick fix solution' or by saying that we could resolve a chronic multifaceted problem with a simple pill, we could end up making those affected by obesity even more unwell, thus further entrenching eating disorder thoughts and behaviours. For those more sceptics, Wegovy *could be framed as the solution for those already living with a very high BMI, but not as a viable solution for all those living with overweight and lower rates of obesity*.

The results on which the efficiency of Wegovy is based *have also been put into question* in several regards.

- There are concerns over the fact that *studies proving the efficiency of the drug* were financed by Novo Nordisk themselves.
- The persistence of side effects is not sufficiently covered - especially regarding the intestinal complaints - *and there are yet no precise studies* on the long-term consequences of taking this drug.
- The efficiency is more related to those with higher levels of obesity, while the results and side effects for those who are 'only' overweight *are still be properly evaluated*.
- This pertains also to the claims that Wegovy could also improve heart problems, which *according to some doctors* is an obvious and logic consequence of losing weight and not a surprising and positive result.
- There are also concerns regarding the influence of Novo Nordisk over experts, health systems and other influential organisations, since this company is using its economic power *to influence the obesity debate and the weight-loss services*.

Finally, another argument highly debated is **the cost of the medication**. In Europe *it would cost around 300 euros a month* (country differences of course), with high profits for the company, but on a larger scale it would be difficult to sustain this treatment for such a large part of the population. For Denmark alone, a country where approximately 900,000 people have a BMI ≥ 30 , if everyone in need received public funding for treatment with Wegovy, *it would result* in regional subsidy costs between DKK 23.9 billion and DKK 27.9 billion, an amount that would be difficult to sustain for the healthcare sector.

This is particularly relevant considering the need for chronic treatment, as all experts agree that when Wegovy treatment is stopped, then there is a decrease in efficiency and there could also be a rebound in weight gain. Therefore, this cost would not be limited to a few weeks or months. Rather, this intervention would involve a significant part of the population for the rest of their lives, which would *entail enormous expenses for the healthcare system across Europe*.

In sum, as it already emerges, there is a contrast between a view for which this drug is a useful tool, and another more sceptical to jump on the 'frenzy bus'. In terms of framing, the question now is which are the pillars on which these two positions structure their argument.

2.3 How are those living with obesity framed within the Wegovy debate?

When analysing the frames used by different stakeholders to discuss Wegovy, the first aspect to consider is how those living with obesity are framed by different actors. In this regard, different stakeholders seem to agree on one aspect: **we need to tackle the unfair stigma for which obese people have only themselves to blame for their condition**.

Novo Nordisk presents as starting point of their work on obesity the need to deconstruct the stigma for which obesity is all about lifestyle, to claim instead that we cannot tell individuals who have lived with obesity to simply change their behaviour, *as*:

"If you ask a person that has lived with obesity for good part of her or his life, you learn that they have tried all kind of things and the body fights back".

This aspect of not being able to find a solution and having to face an unfair stigma by themselves is particularly stressed by Novo Nordisk, which *remarks that* we should not approach people living with obesity with the same indications used for people with normal weight. Instead, the former suffers this condition because of genetic and societal conditions:

*“And if you have developed obesity, you have a high BMI, you are not able to go exercise the same way **as maybe you and I**. So it's important to understand that this is a complex disease. It's not just about what you eat and how you exercise. There's a genetic component that that plays into people developing body weight and weight obesity in different ways. But there's also a socioeconomic dimension to it. And I think it's important that we look at obesity in a more comprehensive way.”*

Several medical doctors stress as well that obesity is the most stigmatized disease, along with mental illness, by society and even by professionals. For this reason, they argue that it is necessary to change the view for which it is a vice, to stress instead that it is a disease in itself, complex, chronic and multicausal. Even if there are concerns that drug could be misused, in the medical sphere there is thus the hope that the approval of these medications in the next several years will increase awareness of the complexity of obesity and weight regulation.

In turn, this could reduce the systemic issue of *“fatphobia”*, which occurs when the person living with obesity is judged merely based on their weight. This prejudice leads to stereotypes according to which an obese person eats too much and/or badly and does not do physical activity. This view dehumanises individuals that struggle with this disease, thus neglecting that often people with obesity have tried different things, but they have been unsuccessful. For example, people with obesity are often described as lazy and not very sporty. Yet, this neglects that there *are for example structural issues* in the transportation system and sport centres that prevent obese people from exercising. These structural barriers discourage the individual, who not only finds it more and more difficult to mobilise, but also loses interest/will in seeking treatment and support.

For this reason, more and more media *are stressing that* at an individual level everyone should become aware of our internalised fatphobia, work on it and correct it. Instead, we should convey the message that all bodies are valid, and that health is much more complex than mere weight. At the medical level, *this means also that*:

“We have not been able to offer obese any benefits from other things that we would do for chronic diseases, which are medications, surgical interventions that sometimes people need. This is a chronic disease. And so there is no magic pill, there is no magic injection, there is no magic surgery, but we can treat that person over the long term for their disease and help them improve their overall health and just their ability to navigate earth.”

Interviews with patients themselves often confirm this need to break the stigma, with patients often confirming their discouragement since they have tried several times to lose weight, but unsuccessfully. For this reason, what some *patients are the most looking for is*:

*“Something that **will tell my brain** you really do not need this and you really do not want it”.*

In this framing, Wegovy thus well corresponds to the patients' needs, as *exemplified by a patient currently on Wegovy*:

"Before I'd tried all the different kinds of diets a million times... and it was always the same story. I lost a lot of weight, and as soon as I let go of the diet just a little bit, I gained the weight in no time, and even a little bit more. But now I'm thinking, 'well, I'm gonna actually have my grandkids and I'm going to play with them'. I'm going to do all the things that a granddad should do."

How some patients on Wegovy are viewing the problem is thus in line with Novo Nordisk description and *advertisement of their product*, where the focus is on giving patients a means to get control of their life back by stopping the cravings to indulge themselves in another meal. In this way, the drug is framed as a way out of a cage, *since people living with obesity can again*:

"Leave their home, they can leave the refrigerator, and they can go out and be socially active."

For what concerns those suffering this condition, there thus seems to be a widespread agreement that people living with obesity cannot be held responsible for their condition, since they are trying themselves to find a solution, and they cannot be left alone with no support doing that. Either society breaks the stigma surrounding obesity, or there will be no progress on reducing obesity rates.

However, especially in Novo Nordisk framing, there seems to be a specific attention on the fact that individuals are trapped in something they cannot defeat by themselves. If this is case, and if people living with obesity are fighting against something too strong for them to defeat, what is defeating them? And do all actors have the same answer to this question?

As we describe in the following section, there are two different answers to this question. On the one side, there is a view that medicalises obesity as an inescapable condition that can be resolved only by means of a drug. On the other side, a systemic view for which focus should be on the systemic factors of an obesogenic food environment.

2.4 Why are people living with obesity unable to change their condition?

If it is not the individuals lacking willingness to lose weight, then there must be another reason why there are increasing rates of obesity. We here present the two main framings responding to the question structuring this section.

2.4.1 The genetic and societal cage

According to Novo Nordisk's CEO, the *reason why we have growing obesity rates is to be found in how society has changed*:

*"The growth of obesity is really linked to how we live today, and how each one of us moves around in society today compared that to our childhood. I remember how I got on my bike in the morning, went to school. I feel guilty about having taken my kids in the car more nowadays.[...] Today there are a lot of cars. The bikes have been replaced by electrical bikes or scooters, so I think those are just **examples of how we live nowadays**."*

However, *Novo Nordisk explanation* is not only focused on how society is designed, since the problem is also to be found in human bodies' genetics:

“Our bodies are designed for a much different lifestyle. One of hard physical labour and our bodies are shaped to install that energy for a long time. I think we have to understand that this is actually not something that is self-inflicted; this is something that the body is imposing on them (the obese)”.

The problem is thus an unfortunate combination between *how current societies are structured* and the lifestyle for which our bodies were meant:

“Our body is designed for a different lifestyle, as it stores fat as a survival mechanism. In ancient times, unless you could store fat until you had the financial means or you could hunt to get the next meal, you would not survive. So, those who have survived for generations are those who can store energy store fat and then burn fat off in good times. As a result of this mechanism, when we stop eating, your body will see losing weight as a health issue, and it will respond by slowing down energy consumption. This shows that obesity is a disease. Those who are genetically disposed to store more fat than others would perhaps have survived better in ancient times. Yet, nowadays where it's easier to get access to calories, if you have those desires for food the cravings you end up having to have medical intervention.”

Interesting here in Novo Nordisk framing is that what in ancient societies could have been an advantage (storing more fat = more likelihood to survive) has become today a handicap to counteract. The problem is that within this framing, there is nothing the individual can do: genetics cannot be changed, and it is impossible to exercise more in urbanised settings. In short, a cage that traps some individuals into a no exit path towards overweight and obesity.

In this ‘cage frame’, a drug becomes the logical way out, as it is the only way by which the victims can acquire the power to counteract this enemy they were previously unable to defeat. Moreover, it also becomes a way by which Novo Nordisk contributes not only to citizens’ lives, but *to the whole society*:

“With ageing populations, we see less and less productive workers living with more and more chronic diseases. If we can address that in a safe and efficient way, then it is good for the whole society”.

If Novo Nordisk and healthcare professionals were our only sources, then Wegovy would fit well as the solution we have all been waiting for. There is no way to change the people’s genetics, and we no longer live in past societies where manual work allowed us to burn the calories we accumulated. In this context, we can only resolve the problem by helping the victim in the form of a drug that stops the hunger cravings. However, other actors stress that this story may be neglecting essential aspects of the why we have increasing rates of obesity in Europe.

2.4.2 The obesogenic food environment

Some NGOs stress that the debate is dominated by a healthcare frame for which stakeholders only focus on treatment of obesity, thus neglecting the importance of programmes focusing on **preventing the onset** of this problem. Moreover, addressing obesity requires important life-changes that a person dependent on a drug may not be able to achieve, as they would simply rely on the drug. Given the need

of a chronic-treatment, this means that – as proven by the fact that Wegovy result cease when the treatment is stopped - the person would be drug dependent and the results would disappear in case someone stopped the treatment.

As stressed by the World Health Organisation, the problem is then there is something more than mere impossibility to exercise. *On the contrary, in a nutshell:*

"Many people live in environments that are conducive to obesity because of foods which are high energy that are available around the clock that are cheap."

For this reason, the director of nutrition and food safety at WHO Francesco Branca *stresses that:*

*"The kind of communication that has been done around these drugs - 'we've found a solution' - is wrong. Drugs for obesity are important but must be part of a comprehensive approach. **This is not a silver bullet.**"*

From the public health perspective, there seems then to be another part of the story that is missing from the Novo Nordisk tale, namely that citizens take their decisions in obesogenic environments, and there would thus be the need to first of all address this problem. As stressed by the *FEAST*⁵ consortium *in a recent blog on the matter*, the problem could then be that:

"Many of the people at highest risk of 'developing obesity' are in environments that predispose them to eating unhealthily and being more sedentary. They often don't have the financial means to buy healthier food and live in neighbourhoods where it isn't safe to be physically active outside. In addition, their home environments might be very crowded and they may lack the time to prepare their own meals because they are working multiple jobs to make ends meet. Fast food and highly processed food items are then often the only rational and logical choice."

In this framing, the main culprit is then the obesogenic environment that makes it easier for citizens to take the unhealthy choice rather than the healthy one. This problem is not entirely neglected by Novo Nordisk, as in some cases *they stressed that* they are also:

*"In favour of taxation: it's meaningful to make sure that there are no soft drinks candy, etc., in schools. For me it's also meaningful to try to **change behaviour and consumption behaviour** and I think taxes could be something to consider. [...] In certain countries you have soft drinks available in in schools and I think we have to deal with that because if you grow up being customised to more sweet food and drinks, you also generate a preference for that that can be difficult to revert later on in life. We thus need different interventions to make sure that **we develop the right habits and the right preferences** from a taste point of view."*

However, even in acknowledging the importance of food environments, the focus of the Novo-Nordisk frame is always on the individual. In this case, there is still a focus on improving the victim's behaviour rather than on making sure that the system surrounding individuals is always healthier. That is, taxation and public procurement in schools are never described as means to correct the environment where

⁵ FEAST is a Horizon Europe Funded project that focuses on the transition to healthier and more sustainable food system.

individuals take their decisions. Rather, it is about behaviour change and being able to adopt right habits from a taste point of view.

In sum, while there is an agreement concerning the need to remove responsibility from the individuals for having a high BMI, views differ concerning why at the population level there is an increase in obesity rates. In terms of policy, this difference is essential, since solutions proposed to an issue are highly influenced by the frame within which they are developed. In the following section, we describe which are the solutions resulting from the two different framings of the issue.

2.5 Which are the solutions emerging from these two frames?

The way the debate is framed has significant consequences on the problems considered, and the solutions proposed. If we consider Novo Nordisk's framing, then the issue becomes making sure that the solution – the drug – becomes as available as possible. If instead one follows the systemic framing, the focus is more on regulations to make the food system healthier. The fact that Novo Nordisk's framing is currently dominant in the public debate is reflected by the fact that media discussion is now mainly focused on two main issues: how to make sure that there is sufficient offer to match the drug demand, and afterwards how to make sure that everyone in need can access the drugs.

2.5.1 The production issue

The impact of Wegovy on the economic market has been so considerable that Novo Nordisk is now Europe's largest listed company, and there are already *several analysts predicting that* they will end up being the best-selling drug company in history. Novo Nordisk is now being *presented as the company 'saving the Danish economy'*, and that *could enhance the economy of an entire country*. Interestingly, the success of these obesity drugs has been such *that in some media*, there have been also discussion on how fast food retailers will be affected by the forecasted changes in diet behaviour. If people will stop craving junk food, who is going to eat the famous 'Big Mac' or similar products?

As *confirmed by Novo Nordisk themselves*, the demand for the drug has been so overwhelming that they have also been surprised. The demand has stepped up much more than they had forecasted, and it is likely *to continue in this way in the coming years*, with a growth in demand of 18-26% in 2024. Only in the United States, this could mean an increase in consumers *by anywhere between 10 to 70 million by 2028*.

Market wise, this has big repercussions: *according to research from Goldman Sachs*, the anti-obesity drugs market is worth some \$6bn this year. But by 2030, it **could grow by more than 16 times, reaching \$100bn**. It thus does not come as a surprise that Novo Nordisk is now heavily investing *in building new production facilities* in several countries to be able to meet the demand in the coming years.

The market opportunity is confirmed by Eli Lilly, the main competitor, and now also other pharmaceutical companies such as Pfizer and Swiss Roche *have decided to invest massively in weight-loss products*. For the time being, Novo Nordisk is still in an advantage position as it has the patent on semaglutide (but not on GLP1 RAs in general) and its injector pen. However, when the patent will expire, *the market will be opened to several companies* that may also be able to offer a generic version of the drug. At the same time, this is unlikely to represent a big problem for these companies. This kind of opportunity, in market terms, is so big that *according to Novo Nordisk CEO* it has almost no comparison:

"I have never come across a commercial opportunity as large as this. We are discussing perhaps a billion people, so it is a market where there's ample opportunity for more competitors to serve that market".

The frenetic demand for the product concerns also Ely Lilly, *which is also expanding its offer in this market* and increasing the production of their obesity drug. *This company has launched a new platform called LillyDirect*, which is a telehealth platform where consumers can directly request the drugs needed and have them delivered directly at home. This *rush involved also other pharmacy chains, and services such as Weight Watchers*, which has recently bought a telehealth company to provide obesity meds.

However, this measure has come under scrutiny because some *healthcare experts have stressed that* this medicine should not be treated as a consumer good, and that treatments should not be commodities. The risk is that without the required medical supervision, patients could misuse the drug, which would in turn lead to dangerous side effects.

There are two other issues related to the huge demand of the product and the fact that companies are not yet able to match the production to the demand. First, *illegal sales of Wegovy online* are now emerging. This is even more problematic because *often it is not the original drug*, but a fake one which could have serious dangerous consequences. Second, that in certain countries – such as *the UK* - there are now waiting lists of patients waiting to receive this treatment.

The focus of media on the production and the availability of the product well connects to Novo Nordisk's framing of the issue. As specified, this framing presents the problem as a cage made of a mixture of genetical problems and uncontrollable societal developments. Therefore, the drug becomes the most logical solution to exit this cage. And if this drug is the most logical solution, there are two actions that must be taken.

First, as described in this section, **the supply must be able to respond to the demand**. To this end, it is necessary that Novo Nordisk can expand their production sites. Otherwise, there is the risk that people may start looking in illegal markets, and that people in need may have to wait to access the drug. The focus on access to the drug is stressed also by Ely Lilly, *who similarly explain that*:

"Wider access to these medicines is crucial. That's why Lilly is committed to working with healthcare system partners, government and industry to ensure that people who can benefit from Zepbound can access it."

Second, connected to this, is **the aspect of availability**. If the resource needed is scarce, then it is also necessary to consider the equity aspect of how to make sure that everyone can equally access the drug.

2.5.2 Health Inequalities as access to the drug

Within the framework presented by Novo Nordisk, there is the need to make sure that everyone can access the drug, *since*:

"Those who pay out of their pocket today are typically people who are who are better off, who can make a choice whether they pay out of pocket or what they decide to do with the financial means. But when it comes to less fortunate people, most likely a lower price point would not

really cater for them either. So, they will have to rely on the health care systems that are active in different countries."

Novo Nordisk thus suggests that access to the drug should be diversified according to the individuals' socioeconomic status, *since*:

"There will probably be no country that will be able to fund for obesity care for everybody living with obesity."

This entails that according to Novo Nordisk the best way to grant equity in access to the drug is that those who can afford to pay for the drug will have to use their own resources, while healthcare systems *can cover for the*:

"Less fortunate people and those with the highest BMI. When you look at who are the patients consuming healthcare cost, you'll see that people struggling with obesity are among those who consume the highest cost in healthcare systems and by addressing that we actually take the burden of the healthcare system."

Novo Nordisk can thus frame its actions **as focused on addressing health inequalities**, *since*:

"Typically, the government isn't willing in some places to do that (cover expenses for the drug to those who cannot afford it) but that's what we're working on now. I believe that [...] there is very robust return on this investment, and you can say that return just become even stronger because we now have an obesity medicine reducing cardiovascular risk by 20%."

At the same time, Novo Nordisk can propose itself as the **best form of prevention for public health**, as:

"Our governments are more open now to the idea of investing in the drug because they help preventing something that happens down the road. Governments and healthcare systems have not been very good on investing in prevention."

Finally, in terms of prevention, according to Novo Nordisk also children can be treated **with the drug**, *as*:

"By changing the trajectory of a child, you could prevent the chronic nature of obesity. If you are middle age and you have been struggling with obesity for many years, the likelihood of getting a cure is not that high. If we do medical intervention early enough with children, then you can change the body in terms of what will be a normal weight be for you later on. As you go through puberty, many change body shape, so I think it's an opportunity to put an individual on a much healthier track for the rest of their life."

In terms of framing, the 'obesity story' told by Novo Nordisk is thus coherent. It starts from explaining the situation of those living with obesity, moving to describing why these individuals cannot be left alone battling a fight they cannot win against the disease, and finally presenting why the drug is the best tool for of prevention and to address health inequalities.

As described above, this story has managed to impose itself in the media, where the story is now mostly focused on presenting the '*miracle*' drug and on making sure that we produce and make available

Wegovy. On top of this, this framing seems also to be the one currently adopted by at least some of the first governments where Wegovy has been approved.

2.5.3 Production and availability in governments debate

Given the novelty of the debate, and the fact that only a few countries have already approved Wegovy, the number of governmental views on this issue that was possible to collect is limited. However, from the Danish (Novo Nordisk is a Danish company) and German and UK debate, there are interesting signals that the governmental debate may be moving more towards the Novo Nordisk framing rather than the systemic one. This is particularly evident in the words of the Danish Prime Minister Mette Frederiksen, *who stated that*:

*"Many Danes struggle with obesity. We know from the government's side that many Danes are already happy with some of the new types of medicine that seem to be able to help with weight loss. And we also know that **some of you have tried all sorts of things that haven't worked**. We also know that the new medicine is very, very expensive. And we in the government want more Danes to get help for lasting weight loss".*

This framing resembles Novo Nordisk's in two main regards. First, there is the focus on the individuals living with obesity as victims who have tried anything they could, but unsuccessfully. Second, there is the focus on how to make this drug more available, and how to make sure that the healthcare system can sustain this expense. This has been at the centre of Danish *governmental debates*, with some ministries urging to find criteria to define who will get access to the drug, and who instead will not. That is, given the significant expense that would entail subsidising all 900,000 people who are overweight, *current political debate* in Denmark is focusing on how to find a model where it will be possible to subsidise those who would benefit the most from the drug and that currently cannot afford it. This is complicated due to difficulties in analysing which other comorbidities are affecting the same individual. Yet, only by doing so it will be possible to subsidise those who need it the most without driving healthcare systems to bankruptcy.

The aspect of how to finance this drug is present also *in the German debate, with discussions about* whether or not the health system should cover this medication. At the moment, being considered "lifestyle medicines", they are still exempt from reimbursement by the health insurance companies. Criticisms towards this current position reflect the debate on the stigma mentioned above, *as several voices* are now calling for these medicines to be covered by health insurance companies as obesity is a disease and not a self-inflicted condition.

In the United Kingdom, the debate is framed similarly to Denmark, with the prime minister *Rishi Sunak saying that*:

"Obesity puts huge pressure on the NHS. Using the latest drugs to support people to lose weight will be a gamechanger by helping to tackle dangerous obesity-related health conditions such as high blood pressure, diabetes and cancer – reducing pressure on hospitals, supporting people to live healthier and longer lives, and helping to deliver on my priority to cut NHS waiting lists."

This enthusiasm for the drug is shared by the health secretary Steve Barclay, *for whom*:

"We recognise it's often a real challenge for people to lose weight or keep the weight off, and that's why we're embracing the latest medication and making sure the NHS is at the front of the queue. Moreover, there could be potential economic benefits from reducing the numbers of people absent from work because of health issues linked to obesity."

Overall, *as also confirmed* by the programme director in the centre for health technology evaluation at the National Institute for Health and Care Excellence, the official position seems to be that there is a large unmet need for many people living with obesity, and that semaglutide would be a welcome new treatment option. Also in the United Kingdom then, the frame more popular is the one presenting the drug as the key to finally offer a way out of this condition for the many who have tried and could not achieve the results they had hoped for.

From what described above, there seems to be a good compatibility between the frame developed by Novo Nordisk, the debate in the media, and the governmental debate in the countries that have approved this medication. If this was to be accepted as the way to move forwards, then it would be logical that all societal efforts should be focused on increasing production and granting availability.

However, as aforementioned, another part of the story is missing, especially concerning the why are people trapped in this situation. That is, a systemic framing stresses that the structure of our food environments favours the increase in obesity rates at the population level.

2.5.4 Prevention and inequalities from a systemic perspective

As presented in previous sections, *certain voices are sceptical* of this "quick fix solution" to obesity, to argue instead that a *healthy lifestyle* based on regular exercise, stress management, sleep, getting outdoors and a balanced diet still remains the most important way to manage metabolic disease and overall health. Moreover, for most of the population who do not yet have obesity, restarting the gut's built-in appetite and metabolism control **by reintroducing whole foods and awaking the gut microbiome** may be a much better approach to promote healthy metabolism.

In this regard, a systemic perspective stresses also that it is important **to differentiate between those who have already a high BMI and chronic obesity from the rest of the population**. For the former, drugs could be good because they could enable them to adopt healthier nutritional habits, do more movement, and sleep better; all factors that contribute to a healthy weight. For the rest of the population, prevention is something more than simply granting access to the drug. As mentioned by a NHS GP in a recent podcast, there is the *need to tackle the root cause* of this problem to:

"Support young families in their early years, which is all being taken away recently and things like tackling marketing of processed food and access to processed food, food prices, people should be eating real food rather than processed food, but that is expensive. Those are the kind of things that we need to focus on. All that feels like we are disconnected from all those things, and that is what is resulting in the UK having one of the highest obesity rates in the world. But really, as with anything with medicine, prevention is better than a cure and we must focus on preventing people getting to that unhealthy weight in the first place."

The aspect stressed in a systemic framing and that is neglected in Novo Nordisk's frames is that there are several systemic and socio-economic determinants that influence how we eat. The problem is that

a drug can block the hunger cravings of the individual, but it cannot transform the food system making it healthier. Despite being marginalised compared to the production and availability issues, this topic appears at times in the media, for example as mentioned *in an opinion piece on a Spanish journal*:

“The poorest families are the ones who eat the most double hamburgers with triple cheese, industrial pastries drowned in trans fats and pancetta pizzas with German sausages, for the simple reason that their calorie/price ratio is unbeatable.”

The problem stressed here is that for several families, especially those living in lower socio-economic conditions, the unhealthy choice is the most economic and rational choice. Furthermore, the kind of food itself may not favour healthy eating, as *ultra-processed foods work like real designer drugs* capable of releasing huge amounts of dopamine in bodies designed to react in this way to sugars and fat, which are scarce in natural foods.

This framing gives a completely **different meaning to health inequalities**. While in the Novo Nordisk framing health inequalities correspond to difficulties in accessing the drug, the problem here is that socioeconomic barriers and an obesogenic environment favour the consumption in vulnerable groups of unhealthy foods over healthy ones. In terms of actions to be taken, increasing production and reducing price (or having it covered by healthcare system) are the ways to address the inequality in the Novo Nordisk framing. In a systemic framing, this does not resolve the problem. Addressing equity becomes a matter of systemically addressing how an obesogenic environment makes it easier for individuals to consume unhealthy products than healthy ones. To do so, requires policy implementation at different levels of governance, and cannot be done by means of a drug.

Therefore, the problem stressed by a systemic framing is that a story based on a victim that can resolve his/her situation only by means of a drug neglect *that obesity is also a social disease*:

“Obesity Is not going to be solved with drugs alone, we need the main revolution to be the change of society. It is not necessary to look for an individual solution, but a social and environmental one.”

In terms of solutions then, Wegovy is not sufficient in the systemic framework, as the drug does not change the obesogenic environment influencing individuals’ dietary behaviour. On the contrary, **solutions foreseen by a systemic framing concern policy regulation** such as (but not limited to):

- *Limiting food deserts and food swamps*
- Limit consumption of ultra-processed foods (UPFs)
- Restricting marketing of unhealthy food;
- Taxing sugar, fats and salt;
- Subsidise consumption of healthy products such as wholegrains, fruits and vegetables;
- Enhancing healthy public procurement in schools
- Food products reformulation;

These are various interventions that concern the whole food system and may also pertain to different ministries, entities, etc. However, they all have one thing in common: they do not focus on “fixing” the individual, but on fixing the system. The problem here is not only that this framing is marginalised in the media, but also that a systemic perspective is neglected at governmental level. As mentioned by

Kremlin Wickramasinghe, head of WHO Europe's Office for Prevention and Control of NCD, advocating for a systemic perspective is complicated, *since*:

"We can't find a country which has implemented at least half of this comprehensive package, so we won't be able to solve obesity or see a reduction in obesity in any single country, when they have not implemented this comprehensive package of policies".

In terms of framing then, it is now evident that there are two different ways – that we called 'Novo Nordisk framing' and 'Systemic framing' – to approach the obesity and drug debate. Here below a table summarising the two views:

	Novo Nordisk Framing	Systemic Framing
Victim	Individuals with obesity	Individuals with obesity
Problem	Genetics + Modern society where movement is no longer part of our lives	Obesogenic environment
Inequalities	Different access to drug due to costs	Unhealthy environment makes it easier for lower SES families to eat unhealthily
Solutions	<ul style="list-style-type: none"> Produce more Wegovy Making Wegovy more available 	Systemic measures to address the food environment

The debate over Wegovy is of primary importance in terms of policy development for the coming years. From what we described, Novo Nordisk framing is now imposing itself as the dominant one, thus marginalising the systemic framing in the media, in governmental debate and in the overall discussion about obesity. For policy implementation, this is relevant as solutions proposed are direct consequence of how the debate is framed. If an individual framing continues to dominate the public debate, then solutions will follow this framing, and policymakers will debate only about production and cost of the drug. If, instead, this framing is challenged, then it is more likely that systemic regulations are discussed and, eventually, implemented.

In the final section, we thus propose a set of counter-frames that could be used by various stakeholders and policymakers to favour a systemic framing over the 'miracle drug' one. These are of course general indications that need to be adapted according to the specific issue. Yet, counter-frames presented below can offer the main guidelines to spot the problems in the current debate, and to try to move the discussion towards the systemic determinants of the issue considered.

2.6 Counter frames to favour a systemic framing

The contrast between the individual and systemic framing starts with the different answers to why current obesity rates are increasing and societies seem unable to stop them. First of all, a systemic framing needs to demonstrate that the 'genetic cage' is not sufficient to explain the problem. Two counter-frames could be used in this regard. The first one is to highlight the nurture part of the problem in the nature Vs nurture debate.

Dramatic increase in obesity rates is due to societal changes, not changes in genetics

Key Message Obesity and overweight trends have dramatically increased over the last decades. There are societal determinants explaining this trend that cannot be reduced to genetics and/or willpower.

Problem The frame proposed by Novo Nordisk presents current situation as a result of genetics and societies where citizens no longer exercise as in ancient times. This is insufficient to explain why over the last decades obesity rates have skyrocketed.

Counter-frame *Obesity rates in the European region* have more than doubled in just the last 50 years, and *estimates* foresee a continuous increase if we continue with current food environment status quo. Providing data on the recent historical development of this condition is the first step to shift the debate towards the systemic debate, since it shows that this is *not due to changes in genetic predisposition and neither in willpower*.

First, obesity increased in all groups in society, in each age, sex and ethnic group. These groups have considerable differences in life experience and attitudes, so it is **implausible that all experienced a simultaneous decline in willpower related to healthy nutrition or exercise**. Second, **changes in genetic predisposition do not occur in such a short timeframe, but over a much longer period**. Furthermore, these changes do not affect all age groups simultaneously. Sharp increase in obesity since the 70s thus cannot be explained by changes in genetics.

Therefore, in the nature Vs nurture debate, it must be stressed that sharp increase in obesity rates over the last decades is due to societal factors. Consequentially, interventions must target the obesogenic food environment, not primarily target individual behaviour. Stressing these two points – not genetics and not willpower – can already help policymakers to frame the obesity debate towards systemic policies rather than individual behaviour interventions.

Obesity in adults, 1975 to 2016

Estimated prevalence of obesity¹, based on general population surveys and statistical modeling. Obesity is a risk factor² for chronic complications, including cardiovascular disease, and premature death.

Our World
in Data

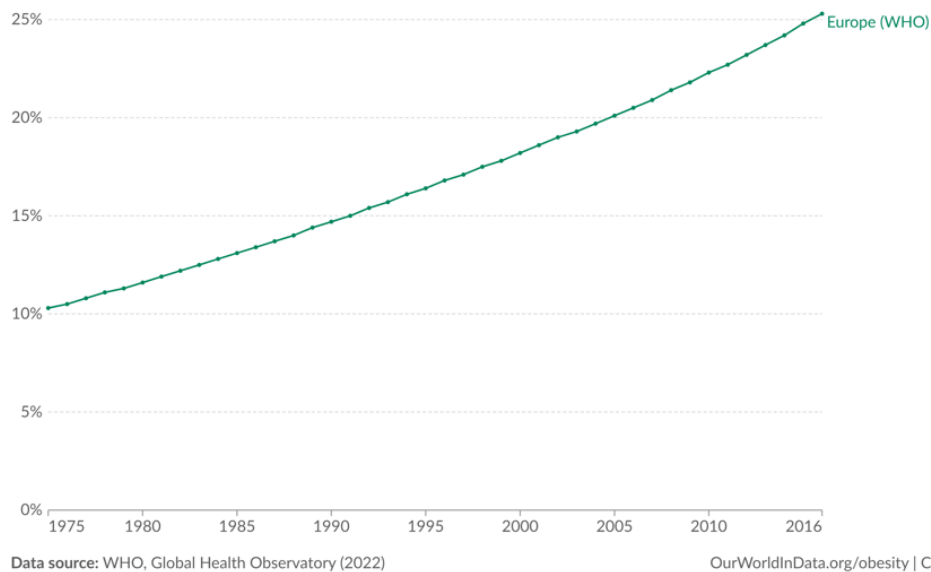


Figure 2 Obesity in adults in the WHO European Region, 1975 to 2016

If it is society that has changed, then it is also important to stress that a systemic solution is not implementing just one 'silver bullet' measure, but a comprehensive set of regulations.

A swallow does not make summer

Key Message Systemic problems require systemic solutions. Implementing only one measure not connecting it to a series of policies will not slow down obesity rates. Food systems must make the healthy choice the easy choice for everyone and at any time from when individuals wake up in the morning to when they go to bed in the evening.

Problem In public health, but we could say in contemporary society overall, the debate is always focused on finding the key single solution that will fix the issue. Wegovy well fits this need, as it is presented as the silver bullet we were looking for. However, especially in food systems, there is no silver bullet. Solutions can only be achieved by implementing a comprehensive set of regulations.

Corporations are well aware of this, and they will mention every now and then a systemic measure in their interviews. For example, we described that Novo Nordisk mentioned the taxation and the removal of unhealthy food from vending machines in schools.

However, **as the saying that a 'swallow does not make summer', a single regulation is not implementing a systemic set of regulations.** For the food environment to change, food system must favour the healthy option from the moment an individual wakes up in the morning, to when s/he goes to bed in the evening.

Counter-frame In interviews, public debates, conferences, etc. the debate will often be framed towards finding a silver bullet. As a consequence, it will not be a surprise that if you look for a silver bullet, the discussion will be how to find it. This framing can yet be changed by saying that there is no silver bullet, by always stressing the systemic causes of the problem and by underlining the comprehensive set of measures needed to make the food environment healthier. If this happens, then the solutions proposed will follow. If there is no silver bullet for the food system, then debate will not focus on finding one.

Focusing on the daily life of a person can help making this point. For example, a child wakes up in the morning and sees unhealthy food advertisement on the smartphone, then eats breakfast that could be UPF and HFSS, then goes to school where there could be fast foods in the area and s/he could eat these foods before or after school. On the way back from school, s/he can see advertisement of food on the bus, then more advertisement on digital media, then have a dinner with HFSS food, and so on.

Taking unhealthy foods away from vending machines in schools is of course positive. However, looking at the daily life of a person, it is clear that this is not sufficient. If a child goes out of schools and enters a food desert, then the damage is done. Stressing the continuity of protection required to prevent individuals from getting unhealthy food is essential to advocate for a set of systemic policies to make our food system healthier.

Once the need for a systemic perspective is stressed, there are other more specific points that can favour a systemic perspective to an individual one. An important one concerns the need to counteract corporation's strategic usage of physical activity in the obesity debate.

You cannot train out a hypercaloric diet

Key Message *Physical activity is essential for our health on numerous regards*, and the decreasing rates of physical exercise in the European population are worrying issues that need to be tackled by all public health systems. However, obesity is not the simple result of a lack of physical activity, but mostly of bad diets based on HFSS and ultra processed foods. Food system must be healthier regardless of physical activity, and the latter should not be used as an excuse to sway the debate away from unhealthy food system to individual behaviour.

Problem A strategy often used by food industries, and that is prevalent also in Novo Nordisk framing, is to focus on physical activity, or better lack thereof, to explain the increasing rates of obesity. This is often combined with a criticism of modern society compared to an ideal past one that was better suited to the energy expenditure of our bodies.

The problem is that this helps them to shift the debate from systemic regulations to individual behaviour change. The latter is compatible with a 'drug solution' frame, while

a drug cannot address the former. It is necessary to counter-frame this strategic usage of physical activity to detach it from the discussion on obesity.

Counter-frame It is also often assumed that physical activity can compensate for a bad diet, but this is not the case in two main regards. Note that this counter-frame will be considered also in the chapter on zoning laws.

First, for *a diet to be healthy*, it is necessary not only to limit the caloric intake of the individual, but also to make sure that **important nutrients are absorbed** via the intake of fruits, vegetables, legumes, nuts and whole grains. While physical exercise can help burning some excessive calories, it cannot replace the healthy components of a diet.

Second, even if we take the caloric intake into consideration, **the amount of physical activity needed to balance a hypercaloric diet is much higher than what commonly assumed**. Let's take a simplified example to explain this point. A meal (note a very basic one) in *a famous fast-food restaurant such as McDonald's* – a Big Mac, a portion of fries and a medium coca cola – would provide around 1000 kcal.

For an average person to burn this amount of kcal, a rough estimate that can be done with *an online calculator*, it would take around 2 hours and a half hours of aerobic activity.

If we consider *current physical activity rates in Europe*, in a typical week, around 28 % of the population aged 16 or over did not do any exercise outside. Moreover, just over one quarter (27 %) of the EU population exercised for up to 3 hours, 17 % for between 3 and 5 hours and 28 % for 5 hours or more.

This is of course a very oversimplified overview, but it proves that **already only 1 in 2 European citizens do more physical activity in a week than it would take to burn off a single meal in a fast food chain**. This is thus just one small example of the many that could be done to explain why **expecting physical activity to resolve the issue of obesity in the current food system is unrealistic**.

Physical activity is an essential component of a healthy lifestyle and as such should be incentivised as much as possible. More in detail, there are several structural barriers that prevent people from exercising that are not due to individuals' lack of will. Acting on these barriers can help individuals to increase their weekly amount of exercise. However, **physical activity should not be used as primary measure to manage weight, as healthy eating comes first**. Therefore, to contrast this framing, it is necessary to discuss first about healthy foods availability and reduction of unhealthy food intake.

Note that this point could be complicated as other framings could maintain that the lack of physical activity supports the drug intervention. Yet, this is not the case. Prevention and treatment are not the same. Focus here should be on preventing unhealthy foods from being so accessible, not on justifying drug treatment because it is difficult to train out a bad diet.

Another problem is that different stakeholders use same concepts and words, attaching to them dissimilar meanings. From what described above, this occurs on two specific issues: health prevention and health inequalities.

Novo Nordisk

Democratic and systemic approach

Disease Prevention Using Wegovy on a large-scale is a preventive measure. This is due to the fact that it can prevent healthcare expenditure in the long-term. Furthermore, Wegovy could be used in children so that they do not develop diseases later in life.

Systemic framing concerns primordial and primary prevention. Wegovy can at best be conceived as tertiary prevention. The two are different and concern dissimilar interventions.

There are different kinds of prevention and it is important to differentiate between the *four levels of prevention*:

- i. **Primordial**: targets the social conditions that promote disease onset.
- i. **Primary**: activities to prevent diseases before they occur by implementing interventions such as vaccinations and health education.
- i. **Secondary**: early disease detection, often in the form of screening, to prevent the progression of disease by intervening as early as possible on the disease.
- i. **Tertiary**: this concerns the management of the disease by tackling its consequences with the aim of restoring health and providing rehabilitation.

Novo Nordisk's prevention is not primordial or primary prevention. The latter aim to prevent a disease from occurring, and this can be done only by regulating the food system and by acting on the related social determinants of health. On the contrary, Novo Nordisk refers to tertiary prevention, since Wegovy can only be used as a way to reduce the severity of the problem. In policymaking, this is a significant, as it demonstrates that if we are to reduce obesity rates we must act on the primordial and primary levels. Otherwise, the roots of the issue would not be resolved, but only tamed. At any time, **those interested in fostering a systemic perspective need to stress the level of prevention needed to resolve the problem.**

Health Inequalities

Wegovy is meant for all citizens who are overweight or obese. In society, there are yet two groups. Those who can afford to pay for the treatment out of their pocket, and those who cannot. Making sure that the latter can access Wegovy via the healthcare system, or that health insurance can cover this expense, is essential to prevent health inequalities.

There are more structural inequalities in the system that must be addressed so that disadvantaged groups no longer develop higher rates of obesity and overweight. This is a different conception of inequalities than focusing only on who can afterwards get the Wegovy drug.

Because of structural socio-economic inequalities in society, *certain groups in the population are more likely to be overweight and obese than others*. As for several others NCDs, lower levels of education, low socio-economic status, housing, ethnicity, etc. are all aspects that influence obesity rates.

The first question that should be asked in this regard is not whether or not everyone can afford to pay for the drug, but "**does everyone in our society have an equal opportunity to be healthy?**"

The answer to this question is negative, but already reframing the debate to address these points would change the way inequalities are framed in the obesity debate. In this frame, a drug would not resolve the problem because the conditions causing the issue are more structural and require policy implementation and regulations to address health inequalities.

This would work in line with the need to stress different levels of prevention, as both would reframe the debate towards addressing the systemic causes of obesity, rather than the focus on medicalising an individual condition, which *only favours an overmedicalisation of the issue* where *business models replace views based on public health values*.

Another point of contention concerns the economic aspect, as the cost of treating those in need with Wegovy is central in the public debate. Wegovy is presented by Novo Nordisk as an optimal solution also in economic terms, but from a systemic perspective, there are two counter-frames that could be adopted to prove the better value of systemic interventions rather than a medicalisation that relies on the drug only.

Your country is unlikely to afford a large-scale Wegovy intervention

Key Message

There are several systemic interventions that can offer better health results for a much lower economic investment than the one required for Wegovy.

Problem

As stressed by the Danish debate, several countries are currently debating on whether or not it would be actually possible to sustain the expense for Wegovy on a large-scale. As described in the introduction, half of the European citizens are overweight, with 36% pre-obese and 17% obese. A treatment of Wegovy is likely to cost from €190-300 a month (country differences) for a single individual. If we take an average of €250 a month, this means that it would cost around €3000 a year to cover Wegovy for each patient. In terms of costs, this would mean that:

- If Wegovy was to be given to all overweight and obese individuals (224 million individuals), the cost **each year in Europe would be of around 672 billion euros**.
- If Wegovy was to be given only to citizens living with obesity (almost 36 million Europeans), the cost would be of around **107.5 billion euros**.

As mentioned by Novo Nordisk, this number would need to be compared to the cost that overweight and obesity currently have on the healthcare system. Estimates for the European Union vary due to difficulties in calculating direct and indirect cost, but *recent studies* calculate the economic burden of overweight and obesity in Europe to be at around 8% of the total healthcare expenditure. A very general estimate, but that equates to **around 98 billion euros per year**.

This is of course a very oversimplified analysis, as there are several other factors to keep into consideration in terms of direct and indirect costs of obesity and overweight. However, this estimate aims to prove that – considering that even in the most optimistic scenarios Wegovy would not completely erase obesity and overweight – covering this expense at population level for a long timeframe (given the chronic treatment) would be unfeasible for many healthcare systems across the EU. The question is then, can this money be better invested?

Counter-frame

There are several systemic interventions that can efficiently tackle the obesity issue. To mention *just a few examples*:

- Healthy foods in schools: the *EU currently spends* 'only' €250 million to ensure children at school have access to free milk, fruit and vegetables. *Investing more on this projects* could help children developing healthy habits since an early age, thus leading to healthier adults afterwards.
- Currently, *less than 3% of our health and care budgets is spent on (primary/secondary) prevention*. Increasing the percentage of this budget would foster primordial and primary prevention intervention, helping reducing the number of people who get obese in the first place.
- Subsidies to make healthier foods more accessible and affordable *have long proven* to increase the consumption of healthier foods.
- All the systemic interventions cannot be fully covered here, but there is *ample research* proving their cost-effectiveness, especially of *food reformulation, marketing regulations, front-of-package labelling, taxes on products high in sugar, fat and salt (HFSS), packaging size*, etc.

In sum, these are just some of the counter-frames that policymakers can adopt to promote a systemic framing to the obesity debate rather than a medicalised one that promotes the usage of a miracle drug

to resolve problems. Once again, aim of this section was not to completely discredit Wegovy as a viable option for those who have already a high BMI and related comorbidities. If concerns over the side effects and *the difficulties in remaining under treatment for several years are resolved*, then there may be a space for this specific group of the population.

If the focus is instead population level interventions, it is problematic that the democratic and systemic framing presented above is at best marginal in the public debate, if not absent completely. This marginality creates inequalities in how the debate is framed and, consequently, on the solutions proposed. Rebalancing the debate around obesity by promoting a systemic framing is thus necessary if we want the systemic regulations to be part of the solutions considered.

This analysis provided stakeholders and policymakers with an overview of how the debate is currently framed, and what are the ways to rebalance the debate currently skewed towards a 'miracle drug frenzy'. Counter-frames will need to be adapted according to the context and situation used, but they will help making sure that a focus on primary prevention, systemic regulations and the social determinants of health can be central features of the public debate, and not marginal issues discussed only by a few public health institutes and CSOs.

3 Necessary help to citizens' food purchase or a hindrance to national tradition and cultures?

How different stakeholders reacted to the Farm to Fork proposal to implement mandatory front-of-package nutrition labelling, in particular Nutri-Score, across the EU.

3.1 Introduction

As part of the *Farm to Fork Strategy*⁶, the European Commission (EC) aimed to revise the *FIC regulation*, namely the EU rules on the food information provided to consumers. Previously, the FIC only included information related to allergens, origin information for certain meats, and nutritional information for most prepackaged processed foods. The aim of the FIC revision was to provide better labelling information to consumers by introducing a harmonised **mandatory front-of-pack nutrition labelling (FOPNL)** and setting **nutrient profiling criteria** to restrict claims made on foods. Through these changes, the EC hoped to help citizens shift to healthier diets and to incentivise food reformulation by producers. As shown in the table below, *several FOPNL options already in use were considered by the European Commission*.

FOPNL typologies and examples of corresponding FOPNL schemes in the EU

FOPNL studies and their proposed terminology										
Feunekes et al. (2008)	Hodgkins et al. (2012)	Newman et al. (2014)	Savoie et al. (2013)	Julia & Hercberg (2017)	Muller & Ruffieux (2020)	Directiveness	Scope	Gradation	Set of Reference	Signs
More complex schemes	Non-directive	Reductive (non-interpretative)	Nutrient-specific labels	Numerical	Non-directive	All foods	Cardinal	Across-category	Numbers	Reference Intakes label
									Numbers Ideograms	Nutrinform
	Semi-directive	Evaluative (interpretative)		Colour-coded	Diet-directive			Ordinal	Colours Words Numbers	UK MTL label
Simple schemes	Directive	Evaluative (interpretative)	Summary indicator labels	Graded indicators	Food-directive				Colours	Nutri-Score
				Endorsement schemes ('positive logos')		Recommended Food	Binary	Within-category	Ideograms	Keyhole Heart/Health logos Healthy Choice

Binary, expresses opinion by presence or absence; cardinal, expresses information in units; FOPNL, front-of-pack nutrition labelling; MTL, Multiple Traffic Lights; ordinal, divides nutritional score into classes

Figure 3 Front-of-pack nutrition labelling typologies and examples of corresponding schemes in the EU

An in depth analysis of the pros and cons of each of these FOPNL options is beyond the scope of this frame analysis; we will instead focus only on **Nutri-Score**. The rationale for focusing on Nutri-Score is that it was the option that seemed to be the most promising in the early stages of the FIC revisions.

Nutri-Score was developed in France by the national institute of public health (Santé Publique France)⁷, and in particular by a team of researchers working at the Sorbonne Paris North and led by Professor Serge Hercberg. This system is based on a **five colour and letter system** - both a letter (from A (best) to E (worst)) and a colour (from dark green (best) to dark red (worst)) are assigned to a product. With the Nutri-Score, consumers can see at a glance the nutritional value of the product they are purchasing,

⁶ The F2F is a strategy, at the heart of the *EU Green Deal*, which aimed to make European food systems healthy, fair and environmentally friendly.

⁷ Together with other bodies such as the Agency for Food, Environmental and Occupational Health and Safety (ANSES) and the High Council for Public Health (HCSP).

comparing it to alternatives in the same category. *This system was first proposed to the French Ministry of Health in 2014*, and its adoption, on a voluntary basis, involved much debate and a prolonged process.

Since its creation, *several scientific articles* have proven the *public health value of this measure*. It is well perceived and understood by the population and its algorithm can effectively summarise the nutritional quality of foods. In this way, consumers can better classify food according to its nutritional quality, better understand the correct portion size, and better assess the quality of the intended food purchase. Furthermore, *research* has shown that consumption of food in the lower categories of Nutri-Score is associated with chronic disease risk, lending strength to advice that diminishing the consumption of these products can be an important part of the fight against diet-related non communicable diseases (NCDs).

Nutri-Score can also support *several other public health measures*, such as marketing regulation, taxations and subsidy schemes. While researchers continued to maintain that it is not a silver bullet that can resolve all nutritional problems in the EU, and politically this has been a very divisive issue, there seems to be *agreement amongst several researchers* that Nutri-Score can be an effective public health measure because it helps consumers make healthier food choices. Given these wide-ranging benefits, Nutri-Score was the main candidate when the EC decided to implement a mandatory and uniform FOPNL across the EU.

Though *eight EU countries have implemented a Nutri-Score labelling scheme* as of 2024, its widespread adoption across the EU has been anything but simple. Over the last few years, Nutri-Score has become a highly debated topic, with stakeholder positions ranging from strong support, to mixed feelings, to a complete opposition. The debate involved not only the political sphere, but several other fields including the academic literature. For example, a *well-known article published in 2023* demonstrated that while 83% of the studies published in peer-reviewed journals supported Nutri-Score, the likelihood that an article shows unfavourable results to Nutri-Score is 21 times higher if the authors declare a conflict of interest or if the study is funded by the food industry.

Analysing the frames used by several stakeholders can thus offer a good overview of how different interests used frames to affect the public debate on Nutri-Score. In particular, given that the Farm to Fork Strategy was almost entirely dismantled at the end of 2023, and with it the attempt to implement a mandatory FOPNL in Europe, analysing the different frames helps to understand how certain actors managed to hinder the policy process at EU level.

In what follows, we will provide an overview of the arguments used in favour of Nutri-Score (section 2) and the ones used against it (Section 3). We will then consider the political implications of these frames (section 4), finally concluding with a section on the counter-frames that policymakers could use to tackle the hindering frames to policy implementation of a FOPNL.

3.2 Actors supporting the implementation of Nutri-Score

The Farm to Fork debate on the implementation of a mandatory and uniform FOPNL across the EU involved a constellation of different actors. From the support side, the *World Health Organization (WHO) gives clear support to the Nutri-Score*, stressing *that it is an effective tool to guide consumers towards healthier food choices*. In the WHO frame, it is possible to find the two main benefits stressed by Nutri-Score supporters: the help to make informed and healthier dietary choices and reformulation by food industries. As *outlined by Dr Mathilde Touvier*:

“The Nutri-Score has an important role to play, not only to help consumers make informed choices about the nutritional quality of their diet but also to incentivize food manufacturers to

improve the nutritional quality of their products and to help governments implement efficient strategies to prevent cancer and other nutrition-related diseases.”

Touvier also specifies that to maximise its efficacy, the Nutri-Score label must:

“Be affixed in a mandatory manner on all foods in Europe, for more transparency for citizens.”

Furthermore, the WHO explains that the establishment of a FOPNL *must be guided by five principles*:

1. The FOPL system should be aligned with national public health and nutrition policies and food regulations, as well as with relevant WHO guidance and Codex guidelines.
2. A single system should be developed to improve the impact of the FOPL system.
3. Mandatory nutrient declarations on food packages are a prerequisite for FOPL systems.
4. A monitoring and review process should be developed as part of the overall FOPL system for continuing improvements or adjustments, as required.
5. The aims, scope and principles of the FOPL system should be transparent and easily accessible.

The WHO position is in line with several Civil Society Organisations (CSOs) operating at EU level, as described in *some advocacy letters sent by some CSOs organisations to the EC*. Nutriscore is also a step forward towards bringing a systemic perspective to EU food system policy:

“While no policy tool can solve the issue of unhealthy food environments by itself, front-of-pack nutritional labelling, underpinned by robust independent scientific evidence, is an intervention which has been clearly recognized by health experts as one which can tangibly help make the healthier choice the easier choice for consumers.”

When compared to other FOPNL, Nutri-Score emerges here as the preferred option, *as for example stressed by the European Consumer Organisation (BEUC)*:

*“Evidence from research conducted in several countries shows Nutri-Score is **currently the best-performing FOPNL scheme** in both aiding consumers to compare the nutritional quality of foods across a range of products and to make healthier purchasing choices. [...] There’s an urgent need to reverse the tide now. Decision makers must ensure that the healthy food choice becomes widely available, attractive, and affordable. Mandatory front-of-pack labelling – like Nutri-Score – must become one of the options to help consumers make healthier choices.”*

As the WHO, CSOs stressed the need to make sure that this measure *is implemented uniformly across all European States*:

“A harmonised FOPNL scheme will promote the proper functioning of the internal market in line with the EU’s mandate to ensure a high level of consumer and health protection in all its policies. Moreover, it will facilitate the compliance of all its Member States with the commitments that they have made at international level to promote healthier food environments and thereby help to prevent diet-related diseases.”

When the implementation of F2F started to seem at risk in 2021, the advocacy of these organisations really focused on making sure that the EC did not archive the implementation of a uniform FOPNL across the EU. At the centre of this advocacy *was the concern that* the continuous delays in the programme were due to the fact that:

“An intense lobbying campaign against this tool for the benefit of commercial interests has unfortunately muddied the waters”

At the same time, Nutri-Score received support also at the political level. As of 2024, eight European countries have endorsed the Nutri-Score labelling system, namely Belgium, France, Germany,

Luxembourg, the Netherlands, Spain, Switzerland and **Portugal**. *The last country in Europe to adopt Nutri-Score, Portugal, mentioned that it is an important measure to foster primary prevention:*

“Health policies are not limited to health care. In this context, it is necessary to intervene on the main risk factors, namely with the implementation of policies to promote healthy eating”.

France was the first country to adopt this measure, and just three years after its official launch in 2018, *the notoriety of this nutrition label* increased from 58% in 2018 to 93% in 2020, *which according to Santé Publique France shows that:*

“The French population is increasingly appropriating the logo and supports this measure. The positive evolution of the indicators confirms that the Nutri-Score plays a role in the buying habits of the French.”

In a similar fashion, **Luxembourg** *stressed that it is one of the necessary tools to tackle the increase in obesity rates in the country*, and **Belgium** *stated that:*

“Diet is an important factor in good health. Many people are aware of this and are more mindful of what they eat. But nutritional information is not always well understood. This is why the Belgian authorities have decided to support the Nutri-Score; for more transparency.”

In **Switzerland**, there *were some initial concerns* that Nutriscore would not have matched national guidelines, but this did not stop the country from implementing this measure, since:

“The Nutri-Score is not a nutritional recommendation, but an information tool for consumers to make more conscious purchasing decisions. It is a supplement to the Swiss food pyramid [...]. Therefore, the federal government will continue to inform the population in order to strengthen their nutritional skills, and it will specify the different objectives of the two instruments.”

Similar concerns occurred in the **Netherlands**, where there was an initial concern on how Nutriscore would have matched *national guidelines incorporated the Wheel of Five*. However, the Ministry of Health, Welfare and Sport then explained that Nutriscore *was worth being implemented as:*

“An addition to existing nutritional information. The Wheel of Five remains leading for information about a healthy diet. If consumers do choose products outside the bracket of five, there is currently no tool to encourage the choice of the product with the better composition. I expect that the introduction of Nutri-Score will have added value, especially if it is widely used by Dutch manufacturers and supermarkets to provide transparency about the composition of a product in a simple way. [...] I see Nutri-Score, as an easy-to-understand and visually powerful tool for consumers to compare products from a product group and to choose the product with the better composition.”

In **Germany**, the Minister of Food and Agriculture explained that the need to properly inform consumers about their food choices, Nutri-Score’s **scientific validity**, and the well-known motto of Micheal Marmot – “Make the healthy choice the easy choice” - *were central in the decision to implement Nutri-Score:*

“I don't get tired of stressing that people decide for themselves what they eat - and that will continue to be the case in the future. But I want it to be easier for all people in Germany to eat well and healthy; regardless of income, education or origin. This is the goal of the Federal Government's nutrition strategy. [...] But we are responsible here. I, you, all of us together. It's not just about people eating healthy and sustainably; it's about enabling them to make it easier for them. [...] We put on the seat belt in the car today as a matter of course. We no longer

smoke in the restaurant. Times are changing. We are all changing. I see it as my responsibility that this change is also reflected in the food policy of our country.”

Finally, **Spanish** Ministry of Consumer Affairs also relied on *health benefits of Nutriscore and its scientific validity*:

“This FOPNL is the one that has the most support from scientists and nutrition specialists and consumer associations at the Spanish and European level. As he explained, no existing system in the world is perfect, but Nutri-Score is the one that generates the most consensus.”

The support at national level is also reflected in the arguments used by certain MEPs in the debate at European level. Several MEPs stressed the need for a FOPNL reform, and the frames they used reflect well the ones adopted by their counterparts at national level. For example, Veronique Trillet-Lenoir, MEP for the Renew Europe Group, *stressed that*:

“It is our duty to provide all consumers a science based, accurate, reproducible, evolving and understandable information on the nutritional value of the food we buy. Understandable means, understandable to all, including children, including illiterate, including foreigners. [...]. Above all, it should be harmonised [...], and to the majority of sectors, it should be acceptable. First of all, to the consumers, but also to the farmers, because they have to be encouraged to provide healthy food, but also to the manufacturers because they favour a single system, instead of plethora of different logos, but also to the member states, because they will be able to induce a decrease in healthcare costs and finally to the European cohesion, because it suffers from fragmentation of the food labelling policies.”

The scientific value of Nutri-Score, the need to adopt a harmonised measure across the EU, and the need to offer clearer information to consumers in all nations are again central points of the support to this FOPNL. The French MEP Michèle Rivasi MEP, member of the Group of the Greens/European Free Alliance, *stressed that she supported Nutri-Score because*:

“It is scientific, there is an algorithm behind that, and with this algorithm, you can say what is too salt, what is too sugar, and fibre. But now we have some saying ‘no’, it’s against traditional alimentation, artisanal, it’s against Mediterranean alimentation. We speak about what? We speak about only information to the consumer about the product. And we are for Mediterranean alimentation. I come from south of France, I am for olive oil and so on. But ‘la’ [in French, there in English] it’s about the food, it’s about the product. And we are a lot of Members in the Parliament who support Nutri-Score”.

An aspect often mentioned by parties more towards the right is that Nutri-Score may hinder consumers’ freedom of choice. However, this is not necessarily the case for everyone, as stressed by **EPP** MEP Tomislav Sokol, *who mentioned that*:

“We don’t want to tell consumers what to eat, unlike some other political groups, so we want to give consumers the freedom of choice, but this choice needs to be informed. They need to know all the important elements of what they are eating, so that they can make up their mind of whether to eat or not. So for that FOPNL is crucial and what we want at the European Parliament is to have a mandatory and harmonised EU rules on the FOPL so that consumers can choose the diet that they want, preferably a healthy diet.”

Finally, Nutri-Score was also supported by some industries. Most prominent is Nestlé support to this measure, with the *CEO for Zone Europe stating that*:

“Our support for Nutri-Score reflects our commitment to good nutrition and informed food choices. People are increasingly eager to know what is in their food and beverages. We want to provide them with clear nutritional information about our brands. Scientific and consumer evidence show that Nutri-Score is a solution that works in continental Europe.”

This general point has been often confirmed by other members of the company in further interview, *offering also examples from their personal lives:*

“I see it with my own kids: Nutri-Score helps them to adopt healthy habits. It’s not only about choosing the healthiest breakfast cereals but also about consuming certain products with the right frequency. They now get that they shouldn’t have a chocolate bar every day: it’s better to have it on fewer occasions and enjoy it to the fullest. Looking at the positive impact that Nutri-Score has on consumers and on product development, I sincerely hope that the Nutri-Score will become the EU nutrition labelling. It’s not easy to have balanced nutrition so if we’ve a solution that works – like Nutri-Score – we should scale them up.”

Nestlé position is echoed by other companies, which stress that it could be a measure to make order in a system that has become very complex. For example, *the Fruit Juice Centre, which mentioned that:*

“Consumers have a lot of messages given to them at the moment and there is no wonder that there are very few consumers that are achieving this healthy diet that we want them to eat. [...]. Labelling obviously can help in this but only if it gets a holistic view of foods and doesn’t just focus on the negative nutrients, so really it needs to focus on positive nutrients as well.”

These are just some of the thousands of frames that could be collected on what are the arguments used to support Nutri-Score. Yet, the frames provided are sufficient to demonstrate that the support to Nutri-Score is based on four main pillars.

- I. A **strong scientific support**: this FOPNL was developed by an accomplished team of academic researchers, and over the last few years, several publications have supported the public health value of this intervention. All this has given a solid base for those willing to advocate in favour of Nutriscore.
- II. The need **to offer consumers a simplified information** on whether or not what they are consuming is good for their health. Relying on a simple five level scale, and with the aid of colours, Nutri-Score can help individuals understanding at a glance which product in that specific category would be best to buy.
- III. Nutriscore does not need to replace any other intervention. It simply provides an information to consumers, and it can be used by governments **in addition to several other interventions** focused on ameliorating the food environment.
- IV. The fact that it **has been implemented already by 8 countries** in the EU shows that it can function well, offering other Member States a real case scenario from which they can learn how to best adapt this measure to their country.

If we considered only these frames, the implementation of Nutri-Score across all countries in the EU would seem like a no brainer. However, as evident, an important side of the debate is missing here, namely the opposing side.

3.3 The opposition to Nutri-Score

Since the start of discussions on setting a harmonized mandatory FOPNL for all of Europe as part of the Farm to Fork Strategy, several large agri-food companies developed a big campaign to discredit Nutriscore and to stop its adoption at European level. The arguments used reflect well the practices of corporations in other products that are considered significant risk factors, like tobacco, alcohol,

gambling, and fossil fuels, and that are now well studied in the *literature on the commercial determinants of health (CDOH)*.

A main strategy to delay policy implementation is to always stress how the solution is **more education, rather than legislations**. This refers to avoid interfering with individuals' choices, making yet sure that individuals are provided with more information to then be able to chose for themselves. This strategy is used by industries to shift responsibility for taking action towards individuals rather than themselves. That is, it becomes individuals' personal responsibility to take the healthy choice rather than the 'wrong' one, and not a systemic issue that the unhealthy option is more easily accessible than the healthy one.

Usually, this education strategy is used to skew the public debate, and above all to prevent measures such as marketing restrictions, taxation, legislative controls, and other systemic regulations. Nutri-Score an instrument to provide more information to consumers, so it was bizarre to find this strategy used against Nutri-Score. For example, the *SMEunited lobby*, a group representing several small and medium enterprises, *stated that*:

"We should get the people to make informed choices and not convenient choices, and that only goes through education. As soon as you put the label as something healthy on a product that is sold in the supermarket, you get the people that want to make the informed choice, but do not want to take the time to inform themselves only into the supermarket. Then, you put small businesses, specifically bakers, butchers, and so forth, that are not only producing healthy products but sustainable regional products and are stable employers, completely aside. This, I must say from our perspective, especially with the oversimplification of Nutri-Score, for us is very very difficult to stand behind."

This argument is not only present in the frames of some lobby groups, as it can also be found in the opinions of certain academics, such as a professor at the Department of Medicine in Universidad de Barcelona, *who stated that*:

"I don't believe in this kind of front of package labelling, because I believe to educate the population, especially the young people. Now we have the problem of obesity. I don't believe that this front of package labelling may help to reduce obesity. I believe more in education, into eat more healthy dietary pattern adapted to all the conditions, like your preferences, you practice this sport or not, or you have a disease or not. I think that this is out of fashion. I think that we have to move further, and try with the right people for a personal research nutrition and will be better for all the society."

In the same event, another Italian professor used frames which reveal that, more often than not, this education argument is also connected to some sort of sense of political belonging. That is, self-proclaimed liberals often argue that education is the only measure that respects individual liberty:

"That's why we need more education, we need systems that are considering our lifestyle. I am sorry, but telling me this is green, and I can eat 25 packages, it's not making me healthier. I am also sorry to say, if we say education takes time, well then the Nutri-Score is the moral justification of a failure in educating masses. If I was a socialist, and you know I am not, I am a liberal, I would go against the Nutri-Score, because it's a failure. It means we miss educating people that were supposed to be emancipated, and now they go to the supermarket and then they don't have time to read [...]. That is the problem in Europe. People die because they are not informed about food. That is the effort that we should do. And I don't think that we should spend time on an old system, outdated."

A second strategy used to limit damages once the legislative process is already too advanced is to **contrast mandatory regulations, to claim that measures should instead be implemented on a voluntary basis, following self-regulatory frameworks**. The argument is that corporations cannot adapt too quickly to new regulations, so they need time to process what is requested to them. Yet, to prove their willingness to cooperate, they state their willingness to voluntarily and gradually self-regulate, to eventually get to an outcome that well matches both governmental and private interests. This strategy is used by the private sector, despite the fact that *more and more literature* is proving that self-regulations do not provide the results promised. A perfect example of this framing was used by *Fevia*, the federation of Belgian industries, *who referring to Nutriscore mentioned that*:

“A complementary nutrition labelling system must first and foremost be harmonized at European level and must remain voluntary, as provided for by European regulations today. It is difficult to expect companies that use multilingual packaging in several countries to apply a different label system for each of these markets. So let's let our companies choose for themselves whether it is possible for them to add additional information, in addition to the legally mandatory information.”

Third, industries tried in several ways to discredit the **scientific validity of Nutriscore**. This was done in several ways. First, **the functioning of the algorithm** and its ability to put each product in the correct scoring was targeted. For example, the *lobby MUST & partners stressed that*:

“Ingredients are modified by chemical agents only to have a better Nutri-Score without [properly] informing the consumer about these changes, which is quite misleading. For example, parmigiano Reggiano has a Nutri-Score 'D', while McDonald fries have a nutriscore B, despite the fact that the cheese is made from milk, salt and rennet. The fries, on the other hand, contain potatoes, vegetable oil, natural beef flavouring, dextrose, sodium acid pyrophosphate, and salt.”

This criticism has some validity, since the first versions of the Nutri-Score had some incongruencies. However, these criticisms consciously neglect that the algorithm is constantly developed and improved. Thanks to these improvements, *current version of the nutriscore* has already fixed many of the ‘categorisation issues’ of the first years. These criticisms have also a structural problem, since they sway attention away from the fact that nutriscore is important to **make comparisons within the same food category, and not across all food purchases**. More on this below in the counter-frame section. In the battle to discredit Nutri-Score, this biased comparison turned out to be very effective, as it resonates well with the public, and it was also used by the European Commission to initially justify the delays in the implementation of the measure, with commission’s first Vice President Frans Timmermans *stating that*:

“On the Nutri-Score, we are not there yet. I have trouble understanding what it means. How can a processed product have a better Nutri-Score than a natural product?”

On top of the criticism to the algorithm, Nutri-Score debate was highly affected by another well recognised commercial determinant of health: the **industry funding of severely biased research to then be published in complacent scientific journals** (*Chapter 6*). In the Nutri-Score debate, this could be seen especially in the case of *a specific article* published by two individuals receiving funding by the agri-food industry. This article casted doubts not only on the scientific validity of Nutri-Score, but also tried to demonstrate that there was a conflict of interests related to it, with most of the support coming from researchers related to the French team who firstly developed this FOPNL. Since its publishing, lobby groups used it in their activities to block Nutriscore implementation, despite the fact that *this article has been proven* to have methodological errors and several inconsistencies throughout.

A sign of the power by agri-food business is that lobbying often occurs not only via their own lobby groups, but it is reflected in the speech of several favourable politicians. At European level, one of the arguments used by MEPs willing to block Nutri-Score was to connect the implementation of this measure to certain national interests. That is, given that Nutri-Score was developed in France, it was put under scrutiny **the “Frenchness” of this measure**. As the argument goes, all other countries should be wary of this FOPNL because it is an instrument used by the French government to favour their own agenda. In the words of the *Spanish MEP Adrian Vazquez Lazara*:

“I am also concerned, because this is going to be one of the priorities of the French presidency. It's no secret that Nutri-Score is supported by the French Government in order to benefit their big conglomerates in the food sector in France. That's no secret. It is on this basis I hope that the European Commission does not fall into the trap and also considers other options.”

This nationality aspect is even more present in what is probably the main argument that was used to block Nutri-Score, namely that it is against **traditional and local products**. The way this argument was framed varied between countries. In Greece, argument centred on the ‘**natural Vs artificial dichotomy**’, as the Deputy Minister of Rural development & Food *mentioned that*:

“Nutri-Score politically, from an ordinary citizen, could be characterized as the attack of the mass chemical industry against the local traditional-natural diet. Nutri-Score is a single oversimplifying scheme that tries to impose a strange unjustified discrimination of foods, with potential negative effects on the nutritional classification of certain emblematic Greek products (e.g. olive oil, olives, feta cheese, strained yogurt, honey, etc.), while ranking in the best categories are the chemically manufactured products like cola and ketchup”. And therefore:

“The single EU scheme must respect the food culture and typical diets of each member state and not discriminate against traditional foods. The paradox of demonizing traditional products, which play a positive role in nutrition if consumed in the right quantity, at the right time and in the right quantities, must be avoided.”

Romania focused instead on the algorithm structuring the Nutri-Score, mentioning it is too simplistic and unable to consider the size and portion of general food composition. *In the words of the Romanian national authority for the protection of consumers (ANPC)*:

“Nutriscore does not include the entire list of ingredients of a product, thus there is a risk of not providing information about components with negative health effects. Also, the system does not take into account geographical specificities, type of metabolism, effects of food association or different age and activity categories (eg: athletes). Nutriscore cannot claim to provide consumers with accurate information about the healthiness of products. The scheme is discriminatory towards Romanian products or those of other member states. The exception is France. This creates a false impression of additional information”.

This problem reflects negatively, according to this argument, not only on citizens’ health, but according to the Czech Ministry for agriculture *Nutri-Score could*:

“Discriminate against quality and traditional food with composition given by legislation.”

For this reason, the *Czech ministry of agriculture stressed that* it would be better to look for alternative options, specifying that the Italian ‘Nutri-inform’ approach would be much better. This last point is of significant relevance, since it points to the fact that there is a common view from certain countries against Nutri-Score, and that the Italian government is at the center of this position.

An *analysis* of how Nutriscore was framed by several actors in Italy shows that there is an alliance between main food industries, so called defenders of the “made in Italy” and several political actors. This is evident in how *Coldiretti*, the main agriculture confederation, framed the debate, namely *repeatedly saying that* Nutriscore ends up:

“Excluding healthy and natural foods from the diet that have been present on tables for centuries in favour of artificial products”.

Important in this case is how Coldiretti centres its argument on a **threat to traditional food** in favour of the processed ones, *stating that Nutriscore*:

“It is a system that demonizes traditions to benefit a series of industrial products exclusively to promote their sales. And so the real risk is that the tradition will simply disappear from the shelves of the shops.”

The argument that tradition – without clearly specifying what this is or how it has developed - needs to be defended from an external interference is developed centrally by Coldiretti, but then used efficiently by all sectorial industries. For example, the representative of one specific type of Italian cheese *mentioned that*:

“This cheese probably contains more salt than a tasteless and industrial cheese, but it is a natural product and, thank God, in Sardinia, the main region where pecorino is produced, it is also the land with the most centenarians. This shows that this diet is absolutely not bad for your health.”

Coldiretti is well connected to the current Italian government, with the Italian prime minister often repeating that they are *going to oppose any* measure that is:

“Discriminatory and penalising our agri-food system”.

The Italian Agriculture Minister has also been at the forefront of the battle against Nutri-Score, often *repeating that* this system provides no useful information to consumers:

“We do not believe that there should be instruments that are not sufficient from the point of view of information and that are even dangerous from the point of view of conditioning the consumer.”

In other interviews, the defence of tradition and local products, also with reference to the UNESCO, emerged again as dominant frame to oppose Nutri-Score. Furthermore, there is also a reference to a **resistance against multinationals**, as if Nutri-Score favoured the interests of big agri-food corporations at the expenses of the small and local producers:

“The application of Nutri-Score would produce discriminatory effects towards food excellence, conditioning consumers and directing them, as many multinationals would like, towards market dynamics in open contrast with the criteria that allowed the Mediterranean Diet to be inscribed on the UNESCO Intangible Cultural Heritage List. Suffice it to say that products of absolute excellence, such as Parmesan cheese, would be qualified as unhealthy. [...] We will defend Italy's strategic vision in Europe and work to build a stronger Europe that favours quality products, which are the fundamental pillar of our economy and culture”.

As an alternative to Nutriscore, the Italian government also developed the *“Nutrinform battery”*, a system that according to the Italian government functions much better than the French alternative. In

particular, according to the promoters, this system is better as it is not based on an algorithm and also based on portions and not on a 100-gram serving. An in depth analysis of this system exceeds the purpose of this paper, but *several scientific studies* questioned the scientific validity of this labelling system, and *further publications* proved the better efficiency of Nutri-Score than Nutrinform.

For this reason, the Italian system seems more the result of political and economic interests of the Italian government rather than a system based on public health science. Interestingly, there is a discrepancy between public campaigning and official meetings even from Coldiretti itself. For example, Coldiretti *admitted in meetings with the European Commission* that this system is not yet properly adapted and simple to use.

The Italian crusade against Nutriscore also relied on the creation of ad-hoc lobby groups. One of these was *Competere.eu*, a think tank which stated its intent as proving that science is against Nutriscore. In their framing, it is possible to find a mix between attacks towards the scientific validity of the algorithm, and the need to defend traditional diet, especially **the Mediterranean diet**:

“We have once again highlighted the lack of scientific basis of the Nutri-Score, as it only aims to arbitrarily condemn or promote foods while it does not educate the consumer, forcing him towards choices based on incomprehensible and non-transparent parameters. Nutri-Score, in addition to generating paradoxical classifications of foods that are symbols of the Mediterranean Diet – scientifically considered as among the healthiest nutritional regimes in the world – represents a totally unscientific measure that jeopardizes not only a priceless social and economic heritage such as the Made in Italy agri-food, but also the wellbeing of European citizens.”

As proven by *Bachrach and Baratz* in the 60s, power occurs not only in the manifest choices or actions. Rather, power occurs also when certain decisions are prevented from being taken and/or even considered. In the case of Nutri-Score, this is reflected by the fact that individuals willing to oppose the dominant ‘No Nutri-Score’ struggle to emerge and contest the dominant rhetoric. This difficulty can be found in the words of some important Italian scientists. For example, a former president of the Italian National Institute of Health, *stated that*:

“Today, the anti-Nutri-Score narrative has become not only generalized but totally hegemonic in Italy and one can no longer publicly oppose it.” By supporting publicly Nutri-Score, he then mentions that *“I had simply become a traitor to my country”*.

As for the support, the opposition to Nutri-Score focused on specific points:

- **The inefficiency of the algorithm:** considered unable to properly determine if a product is healthy or not;
- **Attack to local cultures:** regional and local products risk being classified as D or E, which damages local traditions and eating cultures, while favouring ultra processed foods and big chains. Particularly powerful was the Italian crusade to protect the mediterranean diet;
- **It does not educate:** this is not how you educate the population on having healthier diets;
- **Self-regulation and not mandatory rules:** industries mentioned that if Nutri-Score has to be implemented, then it should be on a voluntary basis so that they can decide whether it is feasible for them or not.

Given that the focus of this analysis is how different actors tried to influence the policy process via different framings of the issue, we do not delve into detail in all steps that led to the failure of the Farm to Fork. However, as for almost all points of the F2F strategy, industry lobbying managed to efficiently

halt EU plans, thanks to *an efficient lobbying strategy* and well developed frames to conquer the public debate. Eventually, the decision can be summarised in the few words of the representative of the European Commission, *who stated that*:

"The Commission is not going to propose the Nutri-Score not to put on the table something that polarises the debates".

From a public health perspective, this is a significant loss, as Nutri-Score could have been an important step forwards towards a healthier and more sustainable food system. In the final section, we offer a selection of counter-frames that can be used to counteract the frames used by the industry and the Nutri-Score front.

3.4 The counter-frames

Compared to the carefully thought framing by Novo Nordisk on Wegovy, the framing opposition to Nutri-Score results often simplistic and generic. Concepts of tradition, culture, local, etc. are never well-defined, and often unfunded from a scientific perspective. It is worrying that simplistic frames managed to be so efficient in dominating the public debate. However, this also means that counter-frames can effectively be used to advance the public health agenda. In the tables below, we offer a series of counter-frames that could be used to facilitate policy implementation, while also de-constructing the attempts to misinform about Nutri-Score.

First of all, there are three counter-frames that can be used to **defend the algorithm** from the attacks of the corporate lobbying

1A) It does not make sense to make random comparisons between food groups

Key message	Nutri-Score is primarily meant to help consumers choosing the healthier alternative within the same food category.
Problem	Corporate lobbying tries to discredit Nutri-Score by finding cases where the algorithm fails to indicate the correct category for a specific food. Often used is the example of olive oil, which initially was ranked D, while McDonald fries were B.
Counter-Frame	Choosing between the same groups means that consumer in the supermarket can, for example, look at different breakfast cereals, and according to their Nutri-Score rank pick the healthier one. This can also be applied to food belonging to different families, but there must be a relevance in their conditions of use or consumption. For example, it makes sense to compare a yoghurt to a dessert cream. In a nutshell, the comparison must make sense. In their food purchase, it is unlikely that consumers willing to buy parmesan cheese, after seeing an orange Nutri-Score, will drop it, leave the supermarket, and then go immediately to a McDonald to get some fries because they remember that they were a B. Comparing two different foods does not make sense, so discussions should always focus on same food categories.

1B) Algorithm is constantly evolving

Key message	Algorithm can be improved, so any imperfection of the past or current version can be ameliorated if necessary. This does not mean Nutri-Score has no scientific validity, but simply that – as any scientific instrument – it can be constantly improved with time.
Problem	Corporate lobby framing selects specific foods that should be ranked better – or worse - to prove that Nutri-Score has no scientific validity. They use this argument to reject entirely this FOPNL, and not to ask for improvements.
Counter-frame	We use one specific product to explain how this counter-frame could be used with all items. A case often used to discredit the algorithm is olive oil, which was initially ranked as D. Not the focus here to delve too much into the health properties of the product, but this is a good case to show that algorithm is constantly updated and improved. Over the years, olive oil has first moved to the C category, and soon will be B. Same goes for several other products, and also the other way around. For example, <i>in the new version</i> drinks with sweetener are assigned to categories C to E, instead of B as before. Even in the cases in which there were indeed some imperfections in the first version of the FOPNL, researchers have managed to adapt and improve the algorithm. Therefore, the matter is ‘can – and if so how - the algorithm be improved’ and not ‘this is unscientific and does not work’ . As for several other counter-frames related to public health interventions, the measure must be analysed compared to current status quo, and not to an ideal perfection. The question is whether Nutri-Score improves the status quo, not if it is an absolutely perfect instrument, and evidence proves that benefits way exceed the imperfections in the algorithm.

And third and final one is that:

1C) Quantity to be consumed is relevant for the grade of the product

Key Message	Nutri-Score helps guiding citizens in their purchases and in the consumption of food and beverages. If a product receives an orange or red grade, it does not mean it must never be consumed, but that the quantities of the product should always be limited. Nutri-Score grading can help consumers reducing their purchase of unhealthy products, and also indicating that their consumption should be as moderate as possible.
Problem	Especially corporate lobbies in Southern European countries focus on how local products, as for example certain cheeses, are discriminated by Nutri-Score, as

they receive a D or an E. As the argument goes, this would hinder the local producers, local traditions, cultures, etc.

Counter-frame The fact that a product is local does not necessarily mean that it is healthy. If a product receives a D or an E on the Nutri-Score, it means that an excessive consumption of it could lead to health issues. For example, overconsumption of salt is a significant driver of cardiovascular diseases, so it is important that citizens are aware of the excessive salt content of certain products. Several cheeses have a very high salt content, so it is important that individuals know they must restrict their consumption. Nutri-Score is meant to help individuals understanding how to relate to certain foods. No one is saying that a bit of cheese every now and then is absolutely bad, as everyone agrees that olive oil can be part of a healthy diet. At the same time, no one would say that it is healthy to drink the whole bottle of olive oil, or to eat the whole piece of parmesan cheese in your fridge. Nutri-Score helps individuals making their decisions, it does not completely remove certain products.

As presented above, another aspect targeted by opponents to Nutri-Score is that we must respect individual choices and not interfere with them. This argument has been used for decades now by neoliberal ideology to portray a biased conception of liberty in the public debate. Its usage here is just one of the several applications of this concept, and we will analyse it even in the following chapters.

2) Absolute freedom as non-interference exists only if you are by yourself on the moon

Key message Policy regulations do not necessarily limit the people's liberty. Public debate is dominated by a biased conception of liberty for which individuals are free only insofar as they are not interfered with in their decisions. In a societal context, this is impossible, as we must negotiate our choices with the liberty of those surrounding us. Plus, the idea for which regulations necessarily restrict individuals' liberty is a neoliberal invention. You can regulate a system and respect individual liberty at the same time.

Problem As described above, corporate lobbies argue against Nutri-Score saying that it interferes with people's choices, thereby biasing or restricting them. This reflects a neoliberal paradigm which aims only to make sure that corporations can then act free from governmental interference.

Counter-frame The neoliberal argument does not work on several regards:

- i. **Absolute freedom as non-interference does not exist in society:** living in society necessarily entails that we must negotiate our absolute liberty with those of others. To do so, we must set rules and regulations. There are several other ways to define liberty, above all the *republican conception of freedom as non-domination*, for which one is free when no one has the capacity to interfere on an arbitrary basis in your choices. In this framework,

regulations and liberty are perfectly compatible. For example, wearing seat belts in the car limits your absolute freedom as non-interference, but it does not limit your freedom as non-domination. You accept that rules are set for your own and societal wellbeing, so this regulation is perfectly compatible with your life in society. Hence, the only way to have your liberty as non-interference respected is to live by yourself on the moon. On planet earth, life in society must be regulated.

- i. **Shall we restrict advertisement as well then?** As the argument of corporates goes, we must let consumers free in their food decisions. Any argument must be coherent with its premises, so following this non-interference argument we should block all sorts of advertisement as they influence food choices. Maintaining the we should block Nutri-Score while maintaining a food system where millions and millions of euros are spent each year by industries to make sure that they can force their products into individuals' diet is simply contradictory. A simple question asking this to corporate lobbies could change the discussion towards public health goals.
- i. **Nutri-Score does not interfere with liberty of choice:** Grocery shops are full of dozens of products in the same category, and making sense of all that is complicated for everyone. Having a FOPNL that can simplify all this is can only help, and not restrict, individuals' ability to pick the food they think it is better. Furthermore, this would reduce health inequalities, as a graded and coloured system helps those categories in society that find it more difficult to make sense of all the information to which they are exposed on a daily basis.

Finally, an important framing brought by the Southern European coalitions against the Nutri-Score is that it would damage local food cultures and traditions. This is not new, as the defence of local food cultures is *an argument often used by lobbies* to prevent policy regulation.

3A) Food cultures have always changed and adapted

Key message	Opposing lobbies presented food cultures in a stereotypical way, and also as something that has always been the same forever. This is not true, as food cultures evolved continuously throughout history, and they can thus change now as well. Furthermore, <i>it is not true that Nutri-Score favours ultra-processed foods</i> , as the latter are likely to be high in fat, sugar, or salt and thus to receive a low score.
Problem	Lobbies present culture and tradition as two monoliths that have always been the same, and that need to be protected and preserved from an external attack. In doing so, they do not give precise definitions of what cultures and traditions are, and they also neglect the historical processes leading to what current cultures are.
Counter-frame	The main way to dismantle the biased used of food cultures by the lobbies is to rely on food history research. For example, Italian politicians present current food habits as something that has been like this for centuries, and that is only now coming under threat. This is <i>historically wrong</i> . For example, before the

Italian migration to the United States in the 19th and early 20th century, many of the foods now considered cornerstones of the “Made in Italy” were not available to Italians. The story of Pizza well describes two important points in this regard:

- **Food items change:** before the Italian migration to the United States, pizza was found only in Naples, but it was not the product we see today. It was originally a very poor food - a sort of sweet bread - and it had almost no toppings. With the migration to the US, tomato sauce and other ingredients were discovered, became an integral part of the dish, and then came back to Italy. This is the so called “*pizza effect*”, namely something that is born in one place, transforms itself in another place, and then comes back in the original place completely transformed. Same applies to the samosa in India.
- **Invention of tradition:** there is a legend that the most famous pizza, the Margherita, is called like this because it was dedicated after queen Margherita trip to Naples in 1889. However, this is a case of an “*invention of a tradition*” because it would have been offensive to dedicate a pizza to a queen. This was the food of the poorest and not something to be associated to a queen. Instead, it is likely that this story was created in the 30s during fascism to push national identity also through food (with margherita resembling the colours of the Italian flag).

These are just two examples of the many others that could be made to demonstrate how food cultures and traditions can be manipulated by governments or corporations to match specific interests. By demonstrating that food cultures and traditions have continuously evolved, it is possible to demonstrate that policy implementation does not necessarily hinder local traditions. Furthermore, Italian, Spanish, French and all other cuisines are the result of centuries of migrations, exchanges, etc. So it is perfectly normal, from an historical point of view, that the Italian cuisine of the future will be much different from current one.

To conclude, connected to food cultures and tradition is the need to deconstruct the partisan usage of the concept of Mediterranean diet by the agri-food corporates.

3B) Protecting mediterranean diet is an unfunded chimera

Key message Mediterranean diet is a recent concept that *was absolutely not widespread across all southern European regions*, and that *is still not followed by the majority of the population*. Pretending to defend this as a way to defend common dietary patterns across the whole population is an invention that benefits only agri-food corporations. Policy implementation cannot be hindered by something that, at population level, never existed.

Problem Agri-food corporation lobbying uses the concept of mediterranean diet to frame a situation where policy implementation – in this case Nutri-Score – damages local traditions and cultures. As noted, countries in Southern Europe are guiding the crusade against Nutri-Score, and they are using strategically the concept of

Mediterranean diet to mask instead what is an economic interest at the expenses of the whole population's health.

Counter-frame The concept itself of mediterranean diet *was first mentioned by the American Ancel Keys* in the 50s, who tried to connect the lower incidence of certain cardiovascular diseases in certain areas (for example in Cilento in Italy) and the local diet, compared to that in Northern America. When researching what the actual diet consisted of in those region however, researcher noted that nutrition was not based on the products for which Mediterranean diet is famous today, like olive oil, special grains, and wine. On the contrary, the major determinant was that *local populations were poor and mostly suffering from malnutrition*. The concept of mediterranean diet thus did not apply to the Italian population of that period. Pretending that our societies have relied on this diet for centuries is not only an historical false, but offensive to the struggles of these populations.

Same goes for current times. *Research on the adherence to the mediterranean diet* proves that a very limited part of the population adheres to the mediterranean diet. Especially among younger population, the “westernized” and “globalized” diet is much more prevalent. Hence, both in the past and in current times, the mediterranean diet has never been a common dietary pattern.

The point here is not to question whether or not the mediterranean diet is healthy, but to deconstruct the political usage of this concept. This concept does not reflect what people living in the mediterranean area used to eat, and are eating now. It is more of an ideal of a healthy diet. As such, it cannot be used to prevent policy implementation.

In sum, the opposition to Nutri-Score managed to block Nutri-Score from being chosen as a uniform and mandatory FOPNL across the EU. The fact that this opposition was based on frames that could be easily counteracted – theoretically – shows the importance of considering all forms of power. While in this document we focus on Luke's agenda power, FOPNL was eventually dismissed primarily due to direct pressures from the agri-food industry lobbying. Counter-frames can thus have only a limited impact if they are not accompanied by a proper protection of policymaking from lobbying interests.

At the same time, the public debate has been successfully swayed by industries into questioning the reliability of the Nutri-Score, and this has played a part in its dismissal. The defence of the algorithm, and especially the deconstruction of how cultures have been strategically used by lobbyists and connected politicians could go a long way in defending the validity of Nutri-Score. Therefore, both policymakers and interested stakeholders could find it useful to apply presented counter-frames in their policy activities, both at national and European level.

4 The EU debate on the Sustainable use of Plant Protection Products regulation

How the battle between some's will to wait, and others' need to move forward played out during the Farm to Fork strategy debates, leading to the eventual dismissal of the regulation

4.1 Introduction

The usage of pesticides has always been a contentious issue in agriculture policies. While it is clear that crops need to be protected from pests and hazards to preserve the food security of any nation, evidence also demonstrates that *pesticides pose risks to human health and ecosystems*.

Concerning human health, it has not yet been possible to precisely estimate the burden of disease from pesticides, but *research has established links* between exposure to pesticides and an increased risk of chronic diseases such as cancer, heart, respiratory and neurological diseases, and other diseases. These effects are present *especially in occupationally exposed groups*, and in *children and pregnant women*. **In terms of impact on the ecosystem**, pesticides have direct and indirect effects on biodiversity and *water*, contributing to the *decline of several species* and to *crop losses as a result of the decline in pollinators*.

At the same time, pesticides are a lucrative business for European corporations, as they are worth more than **€12 billion annually**. An important aspect is that this market is *dominated by four main producers* – Bayer, BASF, Syngenta and Corteva – who have not only significant economic power, but also political, with investments in PR, spin and lobbying activities (*a combined declared total lobby spending of 15 million euros*). These numbers pertain to these four organisations only, but there are several other lobbies working to defend the interests of pesticide industry. This takes *the amount of lobbying investment per year on pesticides to a declared 40.4 million euros*.

Combining these different interests and determining which is the right threshold between the need to produce food and the need to prevent citizens' exposure to the risks of pesticides has then always been **a major political challenge**. At the EU level, this challenge is tackled by a *large body of legislations* that regulate the marketing and use of plant protection products.

As part of the *Farm to Fork strategy*, the European Commission adopted in 2022 *a proposal for a new regulation on the Sustainable use of Plant Protection Products*. This proposal aimed to bring the existing legislation more in line with the targets set in the *EU Green Deal*, specifically with the goal to mitigate the negative externalities resulting from climate change and biodiversity loss. Out of the several solutions proposed, *the proposal on pesticides aimed to*:

- i. Set legally binding targets to reduce by 50% the use of chemical and hazardous pesticides by 2030;
- ii. Set new rules to enforce environmentally friendly pest controls;
- iii. Ban all pesticides in sensitive areas;
- iv. Give additional EU support via the CAP to help farmers navigate the transition.

In this way, the EC aimed to promote the application of an integrated pest management (IPM), an environmentally friendly approach to controlling pests. Final goal was to make sure that farmers have pests management control tools, but such tool must respect human health and the ecosystem. Therefore, the *EC recognised that* biodiversity loss, especially with pollinators such as bees, poses a direct threat to food security.

The pesticide reduction law or Sustainable Use Regulation (SUR) caused a significant political turmoil at EU level, with CSOs advocating for its implementation, and industries resisting these measures claiming it would have hindered not only their interests, but the food security of the whole continent. In this chapter, we present how the main stakeholders framed the debate.

We will start by presenting the arguments used by industries corporations to block the SUR (section 1), following with the arguments in favour of the SUR from CSOs, NGOs and other actors (section 2). In section three, we give a brief overview of how EU institutions reacted to the different pressures, describing both arguments in favour and against the SUR. In section four, we summarise the reactions to the withdrawal of the SUR. Finally, as for previous chapters, we will conclude with a series of counter-frames (section 5) that policymakers could use to facilitate policy implementation in this topic.

4.2 The SUR as a hazard to EU Food security

Industry representatives expressed their concerns over the SUR in several ways. The most used one was the claim **that we cannot guarantee food security in Europe if we limit current usage of pesticides**. Their main argument was that we could produce more sustainably, but that would imply losing production. This would be a huge risk in a historical moment where the invasion of Ukraine by Russian army is posing so many threats to the stability of the European Union. This impossibility was often expressed by *Copa-Cogeca*, one of the main lobby groups of the food industries in the form of “**we would really love to, but actually we are not sure we can**”. *For example:*

“We all agree on the importance of being sustainable in all aspects and increasing our standards as much as we can, while reducing environmental impact of every activity. [...] This is a collective effort of all the industries to remain competitive in the international market and international context. But we must all well acknowledge, especially in the current socioeconomic situation, the challenges that we are finding, particularly in finding suitable alternatives for replacing the chemicals that we are using.”

This is a strategic position policy wise, as lobby groups manage to propose themselves as a positive and active actor in the process, while simultaneously weakening the need to implement policies to change current pesticide usage. In support of this position, the ‘**competition comparison**’ argument was often used, for which SUR would neglect that it cannot ask European producers to adopt certain standards while international competitors do not have *to stick to similar regulations*:

“When we talk to our international colleagues, European Union is seen as a bit of a overly ambitious, overly enthusiastic continent in this respect, and we are sometimes struggling to convince our partners”.

As for previous topics, the defence of **the status quo is framed as the reasonable and cautious choice**. If this is the case, then this is also the ‘safe option’, so the choice to depart from it must be very well justified. No one likes to depart into the unknown if the current situation is one of comfort and safety. Too many risks would be involved. From this need to acknowledge all external factors, it follows that asking now to transition to a more sustainable *production would be*:

“A little over ambitious, especially considering that we haven’t seen sufficient agronomic or scientific justification that can allow us to understand why these targets were set like that in the first place. Of course, they will harm countries that have already made significant process in reducing the use of these substances”.

Connected to this being over ambitious is the fact **that there is no real alternative** to current system of production. *In Copa-Cogeca’s words:*

“We don’t have enough alternatives that can be safe, effective, affordable and available in the market that can actually cover the demand [...] I mean we all want to collaborate in that regard but first of all we need something tangible that we can use.”

This dichotomy between safety and uncertain is essential to slow down policy implementation, because it requires policymakers to have more certainties before taking an action. Collecting such certainty requires time, which leads to one of industries' favourite framing, namely the **'we need more time to be ready'**. In this case, the framing was helped by the fact that farmers were the main group involved, namely a group that in the public eye has already been put under a lot of stress, and thus needs to be better defended. In this case then, a SUR implementation is framed as too sudden in the farmers' eyes. An example of this *is an intervention in a European Parliament session by the president European Federation of Origin Wines (EFOW)*:

"What kind of means could be used to make sure that wine growers can really reduce the use of those synthetic pesticides? We know that we will need time to avoid any technical deadlock. We have to fight against diseases. You know that a wine is a wonderful plant but we know that it faces diseases as well as over the world, so we will need time to address those issues."

Following a logic line, the i) dichotomy safety/uncertain leads to ii) the need to take time, which then results in one of the most efficient framing developed by the industries over the last decades: iii) the need to have a **well developed impact assessment**. That is, according to this view, before implementing a policy, we must be sure of the impact it will have on all sectors and stakeholders involved. As specified *in an interview by CropLife Europe*, the group representing crop industry:

"We do not go for a one-size-fits all solution [...] You know the headlines were about 50% reduction for everyone and so on. I think we need to be more realistic and listen to every single Member State. We had stronger position from a big group of member states saying we do not agree with this, besides the fact that we need to have an impact assessment, on the consequences of the SUR on food safety. [...] So, there is a need to just make sure that we have the right balance in the approach that is going to be taken and that will require conversations."

This 'impact assessment card' often mainly focuses on business, and the impact it would have on their activities, leaving other factors such as health, environmental sustainability, etc. as secondary items. In this way, requiring a **'Business Impact Assessment'** has quickly become one of industries most used commercial determinant of health to *slow down policy implementation*. By favouring assessments related to economic impact and the business environment, policies are not only slowed down and delayed, but eventually decisions are taken according to criteria that do not prioritise health. Industry lobbies such as Copa-Cogeca, know this very well, and thus *kept repeating the need for further impact assessments over and over*:

"We need alternatives, we need safer substances to replace those products that have been withdrawn from the market. We need impact assessment on food supplies, and we need more resilient crops in response to the environmental changes in the future. [...] You know, we need to do a risk assessment. A proper risk assessment and, in order to do a risk assessment, we need information on the pesticides that are brought out. So, and we need that not as an anonymised form, we need that on a more granular state."

Once again, this is a strategic card for industry lobbyists as it allows them to simultaneously demonstrate **willingness to contribute to the process**, and to **slow down the procedure** by mentioning we need more information before taking concrete actions. *In the words of the Director General of the European Crop Protection Association (ECPA)*:

"We can agree with the direction of travel set out by the European Commission. We are ready to play our role in delivering safer products to produce agriculture more sustainably. However, we are deeply concerned by isolated targets that have been set without any proper impact"

assessment. Therefore, we call on the European Commission to conduct a proper impact assessment on all the targets being them for pesticides, for also for fertilisers, or set-aside land for biodiversity purposes”

While these impact assessments are not *per se* negative, the problem is that a satisfactory result is basically unachievable. In a complex system with diverging and unreconcilable interests, policy implementation is a zero sum game. This entails that finding a solution that simultaneously maximises all stakeholders’ expectations is a chimera that cannot be achieved. Lobbies knows these very well, and they frame a discussion where, if they are not counteracted, all actors would continue waiting for a train that never arrives. If SUR leads to a path with no solution, the logic line that this framing follows then concludes with the need to *find a better balanced solution* that industries can consider. Something that industries can find:

“Realistic and achievable. It’s essential that we strike a balance between sustainability and also feasibility to continue producing and supplying food agricultural products to our consumers. We feel that there are several parts of the SUR that should be very carefully tackled and we need to be careful on how these measures become mandatory for farmers.”

Here, the main problem consists in what lobbies consider as **reasonable**, as it often means in line with current economic paradigm, *since*:

“There has to be a combination of higher market share, higher use of agricultural land for agriculture, organic agriculture, but making economic sense to it, also for farmers. [...] We do not want to sacrifice the good image and good idea in organic farming, just to say that let’s put it out there and compete that to the death. No, we need to recognise that we need to find a balance and how to incorporate these ideas and objectives to the liberal market economy.”

The dichotomy safe Vs uncertain is once again proposed, as industries maintain that any implementation that does not consider these points unavoidably leads to a *toll that will be too high for both producers and consumers*:

“If society tells us that you have to go away from pesticide use, and we see the reduction of crops or the yield by let’s say 30 percent, [...] we have to generate income out of the 70 that is equivalent to the previous income. [...] So we need to say to consumers that instead of that hundred percent we now produce 70. This is what society wanted. So, therefore, this is going to be more expensive.”

And as final point, corporation lobbying also **uses strategically the role of farmers**. Agri-food sector is made of very different actors, since the local small farmer has needs, interests, power, and views very different from big corporations. Instead, industry lobbying often romanticises the defence of the whole sector, portraying these actors as a unified front. For example, while *in its website* Copa-Cogeca describes itself as “the united voice of farmers and agri-cooperatives in the EU”, *smaller farmers stress that*:

“Most of the youth farmers I know and work with are disconnected and in complete disagreement with the vision of Copa-Cogeca, which has a lot of power in the EU but advocates in favour of the status quo and industrial agriculture.”

As we noted for the framing related to the Wegovy drug and Nutri-Score, industries’ framing results extremely coherent and logic if taken isolated from the context. At the same time, this framing wins so easily the policy game also because other voices, such as the one favouring the implementation of the

SUR, do not have the opportunity to be equally listened to. Here below we present a short overview of these alternative framings.

4.3 SUR as integral part of a sustainable food system

As described in the first section, one of the main points of debate concerning the SUR implementation concerned its economic impact. To counteract the framing from the industries, CSOs *tried to stress both that* economic impact would not be so negative, and that there would be instead positive outcomes for the **people's health and the environment**:

“Contrary to what the pesticide lobby claims, the export ban would have only a very negligible impact on employment in the European agrochemical industry. Instead, it would result in strong and positive impact on the health of populations and the environment in importing countries”.

CSOs focused on the need to **adopt a more holistic approach to food security** *which considers that*:

“There is more and more scientific proof of the dire state of biodiversity and the danger of pesticides to our health. We can have no food production without biodiversity.[...] With the upcoming EU elections, politicians will have to show that they serve the common interests for health, clean water, good food and biodiversity and to strengthen farmers' position in the food chain”.

In this holistic approach, farmers are victims as well. However, while industries frame regulations as a threat to farmers' jobs and economic stability, *CSOs stress* more the **health impact** pesticides have on these workers:

*“Because of exposure to chemical pesticides, **farm workers are developing very serious illness** like cancers and Parkinson's disease, are being abandoned to the fate, they are not recognised and more risk to become victims if political inaction continues. Therefore, it is important that occupational illness linked to pesticide exposure is recognised across the European Union. It is essential that the most hazardous pesticides are done immediately, that the use of chemical pesticides in areas frequently used by agricultural workers is forbidden as it must be forbidden inside greenhouses.”*

This shift from a mere focus on business factors also helps changing the **optimal timeframe** expected to implement the SUR. On the one hand, if the focus is on making sure that the economic impact will be minimal for all actors, then frames will be about patience, impact assessments, and need to review if the direction to be taken is the right one according to all stakeholders. On the other hand, if the health and environmental aspects are secondary, then a complete different sense of urgency is required. As it can be noted *in the words of the European Environmental Bureau*:

*“This (SUR) helps us save millions in economic losses but some voices say that we cannot yet reduce the use of chemical pesticides and that we have to wait and keep on waiting. Some voices say that we must invest in costly patented technology with potential risks and necessarily uncertain results. Let's remind that the first generation did not deliver on its promises in terms of yields reduction in the use of pesticides or adaptation to climate change. Therefore, we must start applying the solutions that are there on the palm of our hand **immediately**.”*

CSOs stress that we need a fundamental change in perspective to the timing of action: we cannot keep waiting, but we must **implement the precautionary principle, since**:

“It is very important that the harm is prevented not minimised so that the precautionary principle is applied and that political decision makers give a very strong signal that they are committed to a strong reduction in the use of chemical pesticides in the short term.”

CSOs *stressed in several occasions* that if EU institutions do not prioritise this principle, then they favour industries strategies to delay the policy implementation process:

“The case of thiacloprid is another example of the loose implementation of EU law to the benefit of the agrochemical industry. It will not be possible for the Commission to protect human health and biodiversity as long as such delays and improper implementation of the precautionary principle continue to be structural features of the EU approval procedure.”

Moreover, *as stressed by the director of the Pesticide Action Network*, implementing the SUR would have been a **direct response to what citizens want**:

“Citizens are very much aware that there is no safe use of pesticides, that they damage the environment pollinators and also health. I would add to that that what is not so much known from the public is that the main victims of pesticide use are farmers themselves who face an increase of series of pathologies due to exposure to pesticides.”

The debate on the SUR included also more technical debates on the type of pesticides, specific technologies, strategies, etc., that cannot be analysed here in detail. We here decided to focus on how the points that were more politically relevant for the decisions that were afterwards taken. From these first two sections, the two sides adopted two precise strategies.

On the one side, industries tried to **slow down the process**, cast doubts, raising concerns, asking for impact assessments, and asking time for those involved to be ready for what is to come. This can be summarised with a generic ‘let’s wait until we are ready, even though we are not sure exactly when this will be’. This frame is based mainly on food security, economic and business considerations, so the outputs from this framing are requests for deregulations, less bureaucracy, less obstacles to industries’ actions, and more funds to implement what is necessary.

On the other side, CSOs focused on the now and **the need to intervene as soon as possible** to fix a situation that is clearly not environmentally sustainable and not respecting individuals’ health. This frame does not neglect economic factors, as there are strong claims proving that a more sustainable food production respects food security and it is also good for the economy. These frames also strongly focus on the externalities current pesticides have. The policy outputs from this framing are requests to implement mandatory regulations, which in this case translate into a strong support for the implementation of the SUR.

Over the period of the Farm to Fork Strategy, EU institutions were faced with these two contrasting views. In the following section we try to summarise their framing of the debate, which should help understanding why eventually industries managed to win this ‘battle’ on the SUR.

4.4 Can SUR match everyone expectations? The perspective of the European Institutions

When the SUR was launched, the initial position of the European Commission resembled very clearly the framing of the CSOs. For example the executive Vice-President for the European Green Deal, Frans Timmermans, *said that*:

“We humans depend on nature. For the air we breathe, for the water we drink, for the food we eat – for life. Our economy also runs on nature. The climate and biodiversity crises are threatening the very foundation of our life on Earth. We have been making progress on tackling the climate crisis, and today we add two laws that represent a massive step forward in tackling the looming ecocide. [...]. Reducing pesticide use likewise helps nature recover, and protects the humans who work with these chemicals.”

Nature, health and a sustainable economy are the protagonists in this framing. To this the EC initially *added two points similar to CSOs framing*: the need to respond to citizens’ requests, and the need to listen to science:

“Europeans are clear: they want the EU to act for nature and bring it back to their lives. Scientists are clear: there is no time to lose, the window is closing. And clear is also the business case: every euro spent for restoration will bring us at least eight in return. This is what this landmark proposal is about, restoring biodiversity and ecosystems so that we can live and thrive together with nature. It is a law for all people in Europe and for the generations to come, for a healthy planet and a healthy economy.”

And finally, **health was at the forefront of this strategy**, *as stressed by Commissioner for Health and Food Safety, Stella Kyriakides*:

“It is time to change course on how we use pesticides in the EU. [...] We need to reduce the use of chemical pesticides to protect our soil, air and food, and ultimately the health of our citizens. For the first time, we will ban the use of pesticides in public gardens and playgrounds, ensuring that we are all far less exposed in our daily lives. [...] No one will be left behind.”

This support was present not only in the European Commission, but also in part of the European Parliament, with *some MEPs stressing that* this is both what is **needed to protect the environment and citizens’ health, and what the farmers want**:

“We all agree to say that we need a sustainable agriculture that will take into account the human health as well as the environmental stages and that is the very objective of the new proposal that was put forward by the Commission, to cut by half the use of pesticides in Europe by 2030. Our farmers and producers are ready to commit themselves in this green transition. It is something that can no longer be questioned but to do so, those professionals need tools adapted to their constraints and realities. [...] the EU now has to commit itself to support those professionals to help them to get rid of pesticides and to find alternative solutions”.

Furthermore, *especially from the Greens*, there was a **specific focus on how scientific literature** clearly stresses that the current impact of pesticides on the environment, health, and biodiversity is significant:

“The report that comes from the European Agency of environmental shows the effect on health and for the bees for insect and so on, and for the farmer about the disease like neurology like cancer and so on. They show also that it is very important to change the model to reduce all these pesticides because they kill life. It’s not only about insects, it’s about it’s ecosystem and after it’s a human so we must be very strict with this subject and we must have be very courageous.”

At Member State level, while several countries as Italy, Polonia, and Romania, unified efforts to contrast the SUR, others like **Germany** spoke in favour of this legislation, *stressing that*:

“The efforts to harmonise the legal framework on the use of plant protection products is important. That’s why we are much very much in favour of binding reduction goals.”

The political support to the SUR was not uniform, especially in the EP, with *other groups like the EEP more sceptical on this measure*. Analysing the institutional debate, it is interesting to notice how **the impact assessment card** presented above was the favourite measure to question the SUR. For example, when DG SANTE presented the SUR to the parliament, they received criticisms for a lack of details on how this would have impacted the agri-food sector. An MEP from the EPP replied to such presentation *saying that* he:

“Heard nothing about anybody having investigated what the impact on farm production would be.”

And to that followed others asking:

“What impact would the SUR have on the consumers?” and also that *“The EPP group stands by the fact that there must be no further rash interventions in food safety in times of uncertainty”*.

The impact assessment card was **also used by Member States opposing the SUR**. For example, the Italian Ministry of Agriculture, who *mentioned that*:

“We have to accept that there are still a number of issues that have not been resolved, particularly with regard to an assessment of the impact of this proposed regulation on the entire production system in Europe.”

While the Polish secretary of state *stressed that*:

“For the sake of the quality of legislation, I ask the European Commission to carry out a new reliable impact assessment, taking into account the effects of war in Ukraine, and to re-examine the proposed legal solutions.”

This concern on the impact was echoed by **DG AGRI**, with the EU Agriculture Commissioner *saying that*:

“Yes, we need a solid impact assessment. We need solid information about what the consequences of the use of pesticides will be.”

DG AGRI was also one of the first proponents of the **polarisation problem**. That is, the idea for which we should pause implementation of policies affecting difficult topics because they could only exacerbate – especially in light of the farmers’ protests - tensions in society. *In the words of a Head of Unit at DG AGRI*:

“I think there was a strong debate in society around food and farming, and this has become increasingly polarised and I think that one the lessons that we have drawn clearly from this mandate, that we need to show and we need to work to make agriculture and protection of natural resources go together and we must work with this together; we must strengthen dialogue.”

This position by DG AGRI *was criticised by several stakeholders*, who voiced their concern that this DG was using all their power to delay the implementation of the SUR:

“The AGRI Committee is not moving – they are deliberately and knowingly using the tactics to delay the file. They are creating a pressure for this to be either watered down or not adopted

within this mandate, or spilled over to the next mandate. They do this because they know the window of opportunity in this mandate is closing very fast.”

This was echoed also by the chair of the environmental committee, *who mentioned that:*

“The intention of the AGRI committee to put on hold the parliamentary work on the proposal would put at risk the conclusion of this important legislative procedure under the current term and does not reflect the principle of good cooperation among parliamentary committees.”

Other MEPs from the Green also voiced their concern about how part of the EU institutions were using the impact assessment card promoted by the industry, with Sarah Wiener from the Greens *saying that:*

“The Council wants to delay the work on the SUR with flimsy excuses. Demands are to be rushed through that will have dire consequences for the environment and public health in the EU.”

Wiener interestingly touched upon the timeframe issue as well, *stressing the urgency of the SUR:*

“If the Commission has to withdraw the SUR now, the window of opportunity to act on this topic will remain closed for many years to come. We cannot afford that.”

On this, Greens also stressed how the need for the SUR is not something new, but we have known its need for a long time. In policy terms, this is a further point to argue in favour of an immediate implementation of the SUR. *In the words of Michèle Rivasi:*

“Why the farmers don’t reduce the use of pesticide during several years? Because it’s not today that we know the toxicity of pesticide, it makes 10-20 years ago. And in France we have some target from 2018 which say we have to reduce 50% for example and it’s not the case. We increase the use of pesticide and what is the problem? it’s a problem of knowledge? it’s a problem to follow the farmer to explain that we must we have to reduce the pesticide and to make assumption? What is the best way? Because I don’t believe you now. All the time we say we must reduce and we increase the use. When all our ecosystems are dead, how can we do?”

In sum, the debate at EU level reflected well the clash in framing between the industries and CSOs. On the one side, the more conservative side favouring a cautious approach that would hinder the implementation of the SUR. On the other side, more progressive representatives stressing the need to act, and to do it as soon as possible.

Eventually, the cautious side was the clear winner, as the SUR was abandoned, as most of the other points of Farm to Fork Strategy. From what presented above, it thus does not come as a surprise that some stakeholders took it as a victory, while others as a big loss.

4.5 The outcome of the SUR debate

After two years of intense debate, the SUR legislation was eventually withdrawn, with president of the EC Ursula Von Der Leyen *claiming that:*

“The SUR proposal has become a symbol of polarisation. It has been rejected by the European Parliament. There is no progress anymore in the Council either. So we have to do something. To move forward, more dialogue and a different approach⁸ is needed.”

⁸ She was referring here to the start of the *strategic dialogues on the future of agriculture*.

This decision was of course taken differently by various stakeholders. CSOs clearly saw the decision by the EC to *withdraw the proposal as*:

“The end of an appalling opposition, led by the agro-chemical industry, against a more healthy, future-proof agriculture for the EU.[...] The rejection of the proposal shows a shocking disregard for science, the public interest and the will of EU citizens. Most votes were guided by vested interests and disinformation by the agro-chemical industry.”

CSOs took the decision as a sign that lobbying from the industry got the better over the process, *saying that*:

“Thousands of scientists and millions of citizens have demanded reduction of pesticides to protect health and the environment. By not addressing these demands, the European Parliament is sending a negative signal to voters on its ability to deal with major societal issues. It is evident that the agrilobby has taken control of our House of Democracy.”

Similarly, the president of the *EP Environment Committee called it a*:

“Missed opportunity. This is a mistake, as we were about to thoroughly revise this text to only retain the parts related to alternatives to chemical pesticides by significantly accelerating authorization procedures for biocontrol products and allowing the reasoned use of precision farming tools”.

MEP from the greens, the group more active in supporting the SUR, *claimed even that*:

“This is a very dark day for the society as a whole and for the environment, and also for farmers. [...] The majority of MEPs have prioritized the profits of large agricultural companies to the detriment of the health of our children and the planet.”

On the contrary, satisfaction emerged from those who had fought to prevent this legislation from being enacted. For example, members of the European People’s Party (EPP) *claimed that* the withdrawal decision was:

“Overdue, reasonable and relieving. We have always said that it would be irresponsible to jeopardise European food production in the face of current crises through unrealistic requirements and bureaucracy.”

This decision thus seemed *“sensational”* for the EPP, *as*:

“The EPP Group does not support measures that reduce food production in Europe or impede farmers from producing food. Let farmers farm! Before we move towards an outright ban on plant protection products, we must find suitable alternatives.”

Equally welcoming were the groups representing industrial actors, with for example Copa-Cogeca *commenting that* this decision clearly showed that:

“This top-down proposal stemming from the Farm to Fork logic was poorly designed, poorly evaluated, poorly financed, and offered little alternatives to farmers.”

In sum, from this short overview, it is clear that the hindering position to the SUR implementation won. This final decision was the result of several complex dynamics, but the fact that industries managed to impose their ‘wait and assess’ framing of the debate in the public arena definitely played a significant role. Given the complexity of the topic, it would be naïve to argue that a better reframing of the topic would have been sufficient to change the course of the debate. Yet, at the same time, the fact that industries managed to dominate the debate demonstrates that there is significant space for improvement on how counter-frames can be used to challenge hindering frames, while facilitating policy implementation. In this final section, we offer a series of counter-frames that could be used towards this goal.

4.6 Counter-frames

We described that the core of the industries' framing was the dichotomy between a *safe wait*, and a perceived *risky implementation*. The first counter-frame, presented already in previous chapters, should thus stress better the need to immediately address the topic.

365 tomorrow make a year

Key Message	Delaying policy implementation favours the interests of those benefitting from the status quo, while timely policy implementation can rebalance inequalities by addressing the wellbeing of those currently neglected by the system in place.
Problem	During the debate on the SUR, delaying policy implementation by requesting more time to be ready for changes has been one of the most used strategies by industry lobbying. The problem is that actors currently benefitting from the system do not want change, as this would affect their interests. This delay can either be directly requested, or it can take the form of an impact assessment. The latter is necessary to understand the impact of a specific policy, but it gets to a point where it is not possible to gather sufficient information about everything and anything. Those willing to stop a policy know this, so asking for more time is always an efficient strategy to delay the process, until eventually it gets either washed down, or abandoned.
Counter-Frame	<p>An output where all stakeholders' expectations are maximised is impossible. No matter how much time we put into looking for this option, eventually we will not find the perfect solution. Policy is a zero sum game. Those currently benefitting from the system know this well, and they use delaying strategies to slow down and hinder any attempt to change societal frameworks. They mostly do so by stressing that policymakers cannot expect certain actors to change entirely their practices from one day to another. Thus, they stress that they "need more time". However, this is an old strategy, as each day has a tomorrow. So each day we would wait for the following one, until time passes and opportunities to implement the specific policy is over.</p> <p>It is thus important that policymakers tackle this delaying strategy by stressing that the time to act is now, and that delays have been used for decades now to slow down policy implementation. Any transition requires changes, and these demand adaptations from those involved. Societies have structures – welfare systems, specific funds, etc. - to support those more affected by the transition, but at the same time they cannot continue defending the status quo if this favours certain actors over others.</p>

The need to act now can also be complemented by a better framing on what it entails to wait. Here, there is again the need to counteract the contrast between pure business considerations and health and environmental ones.

Waiting has a social, human and environmental cost

Key message Not implementing policies, such as the SUR, according to business considerations has an impact on other factors, such as health, environment, social issues, etc. We are conscious of the impact pesticides have on human health and biodiversity, so any day we are not acting on it, human lives are lost, and biodiversity disappears. We have the scientific evidence to demonstrate the costs of inaction, so policymakers not implementing policies required are directly responsible for the consequences involved.

Problem Industry lobbying frames the discussion within a business framework where only purely economic factors are taken into consideration. Any decision must then follow a logic of how it impacts current operation of several businesses, and how much it would cost for current businesses to adapt their structure to the new requests. If this cost is the only factor considered, a cautious approach is thus often favoured as it is the most logical solution. This approach has yet a cost on health and the environment that cannot be neglected.

Counter-frame Any delay in policymaking is not neutral. Inaction has a cost in terms of lives lost, environmental damage, social externalities, etc. However, this cost is often neglected because in public debates, the economic framework is often taken as reference point. Within this framework, the debate focuses only on profits and expenses by private companies, and all alternatives are considered as secondary options, if at all considered. This reflects the agenda power, namely the ability of certain actors to make sure that the discussion is framed in a way that favours their interest.

However, there is now plenty of scientific literature available to prove the costs of inaction. It is possible to quantify the economic cost of inaction, the environmental impact, the health impact, and so on. All actors trying to promote policy implementation can thus deconstruct this business friendly agenda to promote instead a framework where several factors are equally balanced. Of course, in several instances this will not be easy given the dominance of the neoliberal ideology at several levels of governance. However, according to each case. Entry points can be found. For example, *research proves that* the pesticide-related costs borne by Europeans amounted to €2.3 billion, which is twice as high as the net profits of the pesticide sector.

Therefore, there is an urgent need to counteract this economic framework, bringing data on the cost of inaction to any debate concerning policy implementation.

The second aspect necessary to deconstruct the business dominated framework is to counteract the “there is no alternative” argument.

Only in a neoliberal framework there is no alternative

Key Message	There are alternative views to the current neoliberal framework in which both the economy and other factors are considered. When industry lobbying portrays a situation where it is either current status quo or an uncertain and unachievable alternative, then it is policymakers responsibility to stress that other solutions, like a <i>wellbeing economy</i> , are achievable.
Problem	We demonstrated that one of the key strategies by the industry to hinder policy implementation is to frame a dichotomy between a safe wait, and an uncertain and difficult world where the policy is implemented. This is a strategy that has been used for a long time by defendants of the neoliberal framework, and that has hindered policy implementation in several occasions.
Counter-frame	<p>There is no alternative only in a neoliberal framework where business considerations are put above anything else. Furthermore, in the case of the SUR, these business indications are often favourable only to the bigger producers, while they limit opportunities for those smaller farmers who want to produce more sustainably. Scientific literature clearly demonstrate that alternative economic model can function, and they can do it better than current neoliberal view. At any time then, it is important to counteract the neoliberal framing and to provide counter-frames where alternatives are real, achievable and more equal.</p> <p>Lobbies will always frame the debate as if there was only one solution, with all alternatives as dangerous, irrational, irresponsible, and so on. For alternative solutions to be considered, it is then essential that policymakers aiming to promote policy implementation deconstruct the view for which only the status quo is a feasible solution.</p>

On the SUR, it was also fundamental to consider how big agri-food actors managed to strategically use the concept of food security.

Environmental Sustainability is essential to food security, not opposed to it

Key Message	Lobbies frame food security in a way that conceives all alternatives as dangerous as they would reduce availability of food. In particular, they claim that pesticide regulation would jeopardise food production, and that alternatives would offer doubtful results. Instead, <i>we have sufficient literature proving that</i> we produce more than enough food to feed everyone in Europe, and that is possible to feed Europe without synthetic pesticides.
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Problem

Lobbies consider only certain aspects of food security, focusing on current availability and prices, and portraying disastrous sceneries if we were to look for alternatives. During the SUR debate, the war in Ukraine was used strategically to claim that we could not afford to move to a more environmentally sustainable food production in such an historical period. Threats included higher prices due to reduced yields and higher production costs and a consequent dependency on imports.

Counter-Frame

Food security is usually conceived according to four dimensions:

- i. **Food Availability:** The availability of sufficient quantities of food of appropriate quality, supplied through domestic production, imports or food aid;
- ii. **Food Access:** individuals having adequate resources to acquire appropriate foods for a nutritious diet. For example, price inflation endangers food affordability, especially for the most vulnerable households (larger share of their budgets on food; diet compromised if switch to products with more calories but poorer in micronutrients)
- iii. **Utilisation:** an individual's nutritional well-being reached through adequate diet, clean water, sanitation, and healthcare. This encompasses a number of non-food factors such as cultural practices in food preparation, feeding practices as well as intrahousehold allocation of food.
- iv. **Stability:** the system is stable, and the dimensions of availability, access and utilisation are sufficiently met. short-term instability can lead to acute food insecurity, and medium- to long-term instability can lead to chronic food insecurity. Climatic, environmental, economic, social, and political factors can all be a source of instability

Agri-food industries consider only these four, to argue that any alternative would reduce availability, prevent easy access to quality food, thus hinder the utilisation by consumers, and the stability of the system. However, this is not the case, because *food security can be conceived including two more dimensions*:

- i. **Agency:** the capacity of the food system's actors to make their own decisions about food;
- i. **Sustainability:** the long-term ability of food systems to provide food security in a way that does not compromise the economic, social, and environmental bases that generate food security for future generations;

These two dimensions are essential because they reframe the discussion about security proving that environmental sustainability is essential to food security, and also that power inequalities in the food systems are negative for food security. SUR was dominated by a framing that neglected these last two dimensions, so counter-frames to promote policy implementation must deconstruct the 4 dimensional conception of food security to promote

instead a more holistic approach that considers also agency and sustainability.

Connected to this point on food security, there is also the fact that farmers are not a united front, but there are significant differences between smaller and local farmers, and gig agri-food industries.

Current pesticides are not a win-win for all food producers involved

Key message While chemical pesticides are an excellent source of profits *for the four big producers in the market*, this does not apply to all actors in the food chain. Prices of pesticides have been increasing, and *studies have proven that* the more farmers use these products, and the lower their income. Blocking the SUR is thus a gain for big pesticide producers such as Bayern, Syngenta, Corteva and BASF, while it is not for smaller and local food producers.

Problem Lobbies at EU level always pretend they are representing farmers as if this group was unite and homogeneous. Given that small farmers are a category that at societal level receives significant support, this is particularly effective, as lobbies manage to present their claims as if they were representing all these actors.

Counter-frame Current production system at EU level has clear winners, which are the main pesticide producers. However, their win does not reflect in a win-win situation for the rest of society. This is the case for citizens' health, for the environment, but especially for smaller producers. Deconstructing the frame for which farmers are a unite front can thus stress better the agency dimension in food security. In this way, inequalities in the system can be better addressed and power imbalances can be exposed.

And finally, as for other policies presented before, the SUR was another case where policymakers ended up in the trap for which only a perfect policy that would have addressed all problems could have been implemented.

We must have a sufficiency principle, not chasing ideal perfection

Key message Policies to be implemented must be compared to current status quo, not to an ideal situation where perfection is achievable. A *sufficiency principle* is needed, for which when there are solid scientific grounds demonstrating that the policy to be implemented is better than the status quo, then there is a moral imperative to proceed with its implementation.

Problem Industry lobbying hinders policy implementation by framing the discussion on a contrast between a perfect ideal situation, and the policy to be implemented. Following this frame, it then becomes necessary to demonstrate that a policy is flawless for it to be implemented. However, this perfection is often

unachievable, and leads to a trap where proponents of the policy are eventually unable to demonstrate the perfection of the policy proposed.

Counter-frame A sufficiency principle is needed to favour policy implementation. Any policy will have certain flaws, and it will not be received well by certain actors in society. Trying to achieve perfection is impossible. What is the most important is the impact policies have compared to the current status quo. The SUR eventually was dismissed because unable to find a perfect solution that would have satisfied all actors. Within this framework, SUR was simply impossible to implement, as this perfection is simply unachievable, especially in a system where current pesticide producers are highly benefitting from the status quo. However, taking one health as reference point, there were clear scientific grounds to prove the SUR was an improvement compared to the status quo. Therefore, a sufficiency principle would help reframing the debate towards a position more favourable to those willing to implement a policy, rather than helping those willing to delay and/or stop it.

In sum, the SUR is another case of a promising policy that eventually did not manage to be implemented. As described in the first two sections, this debate was divided into two clear positions: the CSOs and more progressive politicians aiming to implement the SUR, and the industries and conservative politicians willing to stop it.

The final success by the hindering side is of course not only due to their power of imposing their frames in the public debate. Several factors and interests were at play in this debate, and affected the final outcome. However, the discussion on the SUR at EU level is another clear example of how industry lobbying manages to effectively frame the terms of the debate on a position favourable to their views and interests.

CSOs tried to counteract these frames, yet not managing to have the same reach at societal and political level as the ones from the industries. Identifying the strategies used is thus essential, as only by addressing this inequality in power to affect the terms of the debate, then will it possible for more progressive views to find their way into final implementation.

By themselves, the counter-frames proposed here would not be able to resolve the problem. However, if more and more actors involved in these debates would clearly spot hindering frames, proposing counter-alternatives, then it would be possible for progressive view to tackle hindering frames, and to facilitate the implementation of more sustainable and healthier policies.

5 Zoning laws and the interaction at local level between civil society movements and food industries

Frame analysis of four case studies in different location in the EU (Italy, Ireland, Belgium and the Netherlands) where local authorities tried to prevent a fast food from opening

5.1 Introduction

In the chapter about the Wegovy drug, we described the impact of the obesity epidemic in Europe, stressing how it affects the whole population, but that it is increasingly affecting children. If current status quo is maintained, *this rate is going to skyrocket in the coming years*, with scientific forecast describing by 2035 a 61 % increase in the number of boys living with obesity and a 57 % increase in the number of girls living with obesity.

These rates are the result of the food environments to which citizens – especially children - are exposed, as individuals take their nutritional decisions in contexts which favour the consumption of ultra-processed foods (UPFs) and foods high in fat, sugar, and salt (HFSS), two categories of food that *according to the scientific literature* have clear negative impact on the people's health.

When it comes to children, public food procurement in schools has always been one of the key topics to make sure that schools offer nutritious and healthy food. Several programmes have considered how to improve in this regard, and while there is still plenty of work to do to optimise the offering of food, *positive steps have been undertaken in several EU countries*.

Instead, the same cannot be said for **the food environments that surround the schools**. So far, in Europe, there has been little to no action to enact zoning laws banning companies from settling fast food restaurants or the selling of unhealthy foods near schools. These regulations would give municipalities the power to enact special planning regulations that limit the ability of service providers to settle in the community, and/or carry out their activities if these latter are clearly damaging to citizens' health. This is currently complicated because it creates tensions between spatial planning and the rules adopted at European level on the free movement of services and the freedom for services to settle anywhere they want. However, this does not mean that no actions can be taken. On the contrary, cases in which local municipalities have tried regulating the premises surrounding schools have increased over the last few years.

As any contentious issue related to food, these cases are excellent for a frame analysis, because they 'force' different stakeholders to argue in favour of their position, thus revealing the interests and positions underlying their views. The last chapter of this frame analysis thus focuses on a few specific cases around Europe in which the local municipality tried to prevent a fast-food outlet from opening. In three of the four cases selected here, the fast-food under scrutiny was a McDonald's. While this is a fast food famous for *its negative consequences on health*, the fact that all cases focused on this company is more the result of how widespread this chain of restaurants is, rather than a deliberate choice to focus on this company rather than other fast food outlets. In what follows, we present the frames related to four cases studies:

1. **Florence (Italy)**: in 2016, McDonald tried to open a restaurant in the city centre, and the local municipality tried to prevent them;
2. **Wicklow (Ireland)**: a social movement was formed to prevent the opening of a McDonald close to local schools;
3. **Tervuren (Belgium)**: in 2020 and 2023, a group of local citizens opposed the opening of a McDonald;

4. **Several cities in The Netherlands:** this country has been one of the most advanced in terms of zoning laws, and the related political debate has been quite intense. We thus analysed some of these political discussions, especially concerning Amsterdam, Rotterdam and Utrecht.

As for previous chapter, we collected frames from different stakeholders in all cities, in order to demonstrate how certain frames could be used to prevent the transition to healthier food systems, while others could be efficient in facilitating it. In the final section, we will present a series of counter-frames that policymakers at local level could use to promote regulations aimed at improving local food environments.

5.2 The McDonald battle in Florence's Piazza del Duomo

In 2015 and 2016, there was a controversy in Florence over the attempt by McDonald's to open a restaurant in Piazza del Duomo, one of the city's most historic and culturally significant locations. Initially, in 2015, McDonald submitted a proposal to open a restaurant in where there previously was another shop – Universo Sport – which was closing. However, as response to this attempt, the Mayor of Florence during that period, Dario Nardella, introduced new “Urban Décor Regulations”. These regulations, eventually, blocked McDonald's from opening in the famous square, which is a UNESCO-listed historic centre.

In particular, three rules concerning restaurants in these historic sites affected McDonald's. Of interest is that none of these directly concern public health:

- i. **Use of Local Products:** requirement to source at least 50% of the food products from Tuscany to preserve Florence's traditional culinary heritage;
- ii. **Aesthetic and architectural standards:** new businesses in protected areas must adhere to specific design and decor guidelines in accordance to the traditional appearance of the area. This included restrictions on modern signage, bright colours, and branding that could disrupt the historic environment.
- iii. **Preservation of traditional shops:** the regulations favoured local businesses over multinational chains by encouraging the presence of historic and artisanal shops.

Being unable to match the rules, McDonald saw its permission rejected by the city. As a response, this company filed a 18 million euros lawsuit – the amount they believed they would have profited in the following 18 years if they had had their licence approved - against the city of Florence. McDonald argued that they had been subjected to unfair treatment and that *these were*:

“Discriminatory rules that harm the freedom of private initiative without being beneficial to anyone.”

Analysing the arguments brought by McDonald's, the first argument supporting their interest in opening a restaurant is always related to the positive economic impact that the company would bring to the areas interested by the restaurant. From this, it follows that blocking this restaurant would result in a significant **job loss** for the areas, since *according to one of McDonald's managing directors*:

“We have nine restaurants in Florence, we employ 300 people, why this treatment?”

Furthermore, *the director considered the cultural argument unfair and also discriminatory, as:*

“We are in all the historical centres of Italy and we certainly haven't defaced their history. [...] We completely agree that the cultural and artistic heritage and the Italian historical town centres have to be protected and guaranteed, as well as the traditions and the historical small

shops, but we cannot accept discriminatory regulations that damage the freedom of private initiative without being advantageous to anyone.”

The discussion in media and political settings was thus not focused on public health, which (for what we could find) was almost entirely absent. On the contrary, the rejection was based on ‘being local’ and respecting the cultural and architectural heritage of one of the most famous squares in the world. This emerged clearly in some of the words of the local policymakers, especially from major Nardella, who *repeatedly mentioned that*:

“We don’t have any prejudice. [...] McDonald’s has the right to submit an application because this is permitted under the law, but we also have the right to say no to support instead traditional business in the area.”

At the same time, especially towards the last part of the debate, the position of the Major *became more clear in that*:

“I am against the opening. It is not consistent with our battle that we have been waging for years against fast food and mini markets for the protection of the city’s tradition and identity. Mayors have had their guns blunted for some years now because of liberalisation laws that make it very easy for new businesses to open.”

Nardella also stressed that he had a responsibility to defend the cultural heritage of the square <https://www.ilfoglio.it/cronache/2016/07/02/news/nella-firenze-senza-piu-identita-il-mcdonalds-ci-sarebbe-stato-benissimo-97902/> by reiterating his opposition:

“And that of the council to the opening of a McDonald’s shop in Piazza del Duomo; not only that, but also in other historical and valuable squares in our historical centre, which, let us remember, is a UNESCO heritage site”.

There is then a contrast between the heritage value of the location, and what McDonald’s represents in terms of being a fast food chain, with no identity connected to Tuscany and its traditions. As stressed by the responsible for commerce and tourism in the Tuscany region, *the issue is that*:

“The big brand in a symbolic place like Piazza del Duomo, I am not saying that it risks being improperly enriched, but Brunelleschi’s dome with an M, or with the symbol of a company, I think it is too great a gift to give to a subject.”

This is a position that found the support of a stakeholder not usually involved in these debates, since even local cardinal *expressed his opposition to the fast food*:

“The scheme is by no means respectful of the architectural traditions of one of the most characteristic squares which look on to the colonnade of Saint Peters.”

In the following cases, we saw a clear difference between politicians more liberal and green and progressive ones, with the former framing the debates similarly to the industries, while latter closer to civil society organisations. Instead, in this case, Nardella found support from political actors from the right, as for example from a representative from Brothers of Italy (an Italian far-right party), *who stressed that* this would first not make sense culturally:

“Those who say McDonald’s will create new jobs forget that it will open in place of another business that will close. We are not the least bit interested in knowing that Shanghai, Brussels, New York or Berlin have a McDonald’s in the city’s main square. Florence is a unique city in the

world and defending it from the processes of globalisation must be our first task. If we accept the principle that by now all the world is the same, we are the first to kill the specificity that makes Florence unique and loved all over the world.”

And secondly that even the job creation argument is not convincing:

“In recent days, we have heard from many quarters that opposing the opening of McDonald's would mean opposing the creation of new jobs. We explain to those who say this that McDonald's, should it open, would open in place of another business that would close its doors. For 10 more jobs at McDonald's, therefore, there would be 10 fewer at Universe Sport.”

Finally, Nardella received support also from some NGOs such as *Slow Food*, a global movement focused on ensuring good, clean and fair food for all. Of notice is that even this organisation did not structure their opposition upon public health factors, *but they framed an opposition* between a Tuscan and Italian lifestyle, and what instead promoted by McDonald:

“Increasingly, McDonald's is trying to disguise its true essence of fast & junk food (on which, however, it proudly winks) in search of an apparent respectability. Food is culture, history, belonging, ethics. Our country and this city are also great, renowned and appreciated for its cuisine, for our dishes made with simple ingredients produced with respect for the environment, available resources and seasonality, dishes that have ensured our good health and given us the pleasure of eating and sharing them surrounded by relationships and sociability.”

The opposition to McDonald was thus united and strong, which is one of the main factors leading to the rejection of the application. As of 2025, McDonald has not yet opened a restaurant in Piazza del Duomo in Florence. However, important to note is that while McDonald's was prevented from opening this specific restaurant, it was not excluded from opening in other parts of Florence. On the contrary, there are several McDonald's restaurants in other parts of the city.

The presence of the fast food restaurants in other parts of the city reflects the specificity of the Florentine case, namely that the discussion mainly centred on cultural and heritage features. That is, the McDonald was stopped because it did not fit with the cultural ideal of Tuscany and Italy, and not because it posed other hazards. In particular, obesity and the influence of McDonald's on a specific area was never part of the debate, so public health considerations did not play a part in the decisions taken.

As we shall see, this focus on culture is quite peculiar compared to the next three locations. Nonetheless, this case offers an insight into the limited means available to local municipalities to limit the opening of fast food restaurants, and how majors could be forced to find “creative” ways to overcome these limitations. Furthermore, another specificity of Florence is that some NGOs were involved in the debate (*Slow Food*), but the action mainly involved political actors. As we shall see in the following case study, Wicklow, this was not the same everywhere. On the contrary, in Ireland the challenge started from a group of citizens concerned about their children health.

5.3 The ‘No Fry Zone 4 Kids’ movement in Wicklow

In 2013, an application to open a McDonald's drive through restaurant was made in Wicklow, Ireland. Debate over this application started because this site was located 35 metres away from three schools, which encompass around 1850 students. For this reason, local community started a campaign – called “*No Fry Zone 4 Kids*” - to stop McDonald's from opening this site *as they believed that this zone:*

"Prevents children from getting easy access to unhealthy foods; it helps to build a healthier environment in the community; and it will reduce targeted promotion of unhealthy foods at young children."

After three years, the campaign successfully managed not only to prevent the opening of this restaurant, but also to render Wicklow the first county in Ireland to implement a "No Fry Zone policy" around schools with a specified distance of 400metres. The core of the debate was on children's health, with several policymakers supporting the measure as a way to counteract the rising rates of obesity amongst children. For example, a local politician in Wicklow *stated that:*

"I fully support this proposed amendment and while it is only one aspect of dealing with the potential health time bomb of childhood obesity it is consistent with other policies of the Council which promote exercise and healthy living generally".

And the proximity of a McDonald's to these schools *was clearly identified* at political level as a threat to children's health:

"When it comes to planning permission for schools, consideration should also be taken, that these schools are not built in close proximity to neighbouring retail centres which would further expose our children's health."

The problem was yet to define precisely the **concept of proximity to schools**. The final goal of the campaigners was to include in the local regulations a "No Fry Zone rule" to prevent that fast food outlets could be built within 400metres of schools and playgrounds. This was feasible because the relevant legal framework mentioned the possibility to prevent unhealthy restaurants from opening close to a school, since *it stated that the local area plan:*

"Shall seek to promote active and healthier lifestyles by ensuring that exposure of children to the promotion of foods that are high in fat, salt or sugar is reduced through careful consideration of the appropriateness and/or location of fast food outlets in the vicinity of schools and parks."

The problem was that this wording had no clear definition of proximity, which allowed room for interpretation, thus giving the chance to various fast food outlets to open close to schools. Furthermore, many schools were located in or near town centres, and this made it more complicated to restrict the opening of a fast food in their proximity. It is for this reason that the campaign focused on establishing a specific 400m perimeter. The specific range was also part of the discussion, with some maintaining that a 1km would have been more efficient, but eventually the 400m granted a good balance between the health considerations and the likelihood that such zone would have been implemented.

At the same time, it became clear also that it was essential to **define what is a fast food outlet**. *As stressed* by a representative from the Kildare and Wicklow Education and Training Board (KWETB):

"I believe that defining what constitutes a fast food / takeaway outlet makes it clear what businesses are in scope of this objective – specifically & primarily fast food outlets (which can contribute to the childhood obesity problem) rather than exclude shops offering deli / take away"

foods. This differentiation strengthens the objective by clearly identifying the type of business in scope.”

The scientific community supported this aspect, specifying that for the purposes of this issue a fast food/takeaway outlet *could be defined as*:

“Any outlet whose business will primarily be the sale of hot or otherwise prepared food that is high in fat, salt or sugar (such food being heated or prepared on the premises comprising of the outlet) for consumption on or off the premises comprising of the outlet. For the purposes of considering whether a particular food item is high in fat, salt or sugar, reference shall be had to Department of Health or other governmental guidelines or publications current at the time of considering of a planning application.”

This case in Wicklow is particularly interesting for **how involved civil society was**, an aspect which *was often stressed* by the committee of the ‘No Fry Zone 4 kids’ movement:

“The numbers are extremely impressive from across the spectrum and will surely influence the councillors when the time comes to vote on whether this amendment should be incorporated into the plan or not.”

The strength was not only numerical, but also due to the variety of stakeholders involved. This movement received the support of **several academics**, who provided the scientific arguments necessary to support the movement, as for example professor Harrington from Cork University *who described that* zoning laws can be beneficial both from a health and an economic perspective:

“The Government needs to seize an opportunity to improve the diets of the Irish population, prevent obesity and diet-related non-communicable diseases by investing in the kind of policies and programmes which have demonstrated success in a number of countries. [...] The benefits are two-fold – aside from improving the health of the general population, these measures are highly cost-effective, and in the long-run can help counteract the rising healthcare costs associated with obesity and diet-related-non communicable diseases.”

Parents of the children in school played a fundamental role by actively promoting the need to block McDonald’s, *because*:

“We have a collective responsibility to protect our children and you (the local council) – as a body - can take a stand and show not only parents across the country but to our children, those are the future of these communities you work on behalf and continue to serve, this is an opportunity to put the health and well-being of children before any commercial or ‘fast food’ interests. Put the interests of our children’s long-term health first.”

This **responsibility** was mentioned also by other stakeholders. While certain policymakers followed the industry focus on education *stressing that*:

“There’s an element of temptation for children. But it is also down to parents to educate their children on the dangers of fast food.”

Other policymakers *believed they had to assume the responsibility for their actions*:

“We have a responsibility to invest and safeguard our children and young people. Adopting objective RT17 into the Wicklow County Development Plan is one step in tackling this obesity issue and will provide long-term benefits to our society and our economy.”

This aspect of the responsibility was also stressed by involved academics, *since*:

“We have a responsibility to our children to protect them from those high fat, high sugar foods and encourage healthy, accessible foods. [...] It is crucial that changes are made at community level to facilitate healthier choices for our children and to make the healthy option the easiest option. The physical environment is central to this. Wicklow can now demonstrate leadership by committing to the long-term health and wellbeing of its local communities.”

For this reason, it is not realistic to expect parents to be able to isolate their children from the temptations of these fast foods, *since*:

“It has become increasingly difficult for parents and children to maintain health body weight. The actions taken by Wicklow County Council in this instance are of critical importance and should the correct decisions be made in protecting children from the impact of proximity to fast food outlets to their school, then this will represent practical and positive support of parents who are otherwise at present fighting an uphill struggle in maintaining health body weight.”

Interestingly, quite a few politicians wanted to specify that they were not against the fast food chain per se, but specifically *against their proximity to schools*:

“There is a place for everything and everything in its place. I am not adverse to fast food outlets or blocking employment, just that they be located in a sensible and suitable location.”

Or similarly:

“The proposed site for this McDonald's was utterly inappropriate for a fast food outlet. With childhood obesity a growing problem in Ireland, many parents, myself included, were not happy that a McDonald's would be built beside three schools. I have no opposition to any fast food restaurants opening in the town - just not in a location that close to where our children go to school.”

This is similar to what discussed in Florence. In Italy, the point was that the fast food restaurant was not compatible with the cultural and historical value of the main square, but several actors involved specified that in another location it would have not been a problem. In Ireland, the main goal was to move them away from the schools, not necessarily to claim that such outlets have no space in any zone of the city.

With similar arguments to the ones used in Florence, MacDonald's tried to contrast the committee willing to block the fast food restaurants. First of all, *they stressed that* it was a **significant economic investment** that would have created more than 60 jobs locally. Second, and this will resonate in the Tervuren case described below, McDonald also aimed *to explain that* they never specifically aim to open a restaurant close to schools:

“McDonald's often seeks to locate new restaurants close to retail outlets which are appropriately zoned in accordance with planning guidelines. Proximity to schools is not and will not be a factor for McDonald's in assessing suitable locations for new restaurants.”

McDonald's tried *to point out that* restricting their activities **would have been unfair**, given that there were a number of takeaway restaurants already providing late-night service in that area. Despite their efforts, McDonald's eventually saw their application rejected. The local committee took this *as an opportunity to expand Wicklow's case to the whole country*:

"This is a nationwide problem, one which needs public policy to reverse the trend and a planned approach at every level in order to create a supportive environment in which children in particular can lead healthier lives. [...] As we all know, Planning has a key role to play in the future development of our communities and as such, has a responsibility towards the health and wellbeing of the people, young and old, that reside there."

What is remarkable from this Irish case is the connection between Civil Society framing and policymakers' ones. As mentioned in previous chapter, the frames used by policymakers can be used as reference point to see which of the other stakeholders are going to "win the framing battle". As we described, often public health actors struggle to disseminate their framings, while industries are more effective in making sure their views are afterwards adopted at policy level.

On the contrary, Wicklow case showed how powerful can be a movement if it manages to create a synergy between CSOs, local community, academics, and local and national policymakers. Developing a powerful network as the 'No Fry Zone 4 Kids' is of course not easy, but it can serve as an important point of reference for other countries and cities. In the coming sections, we present two further case studies. The first is Tervuren, in Belgium, where similarly to Wicklow the local community managed to stop the opening of a McDonald's close to a school. The second one does not pertain to a single city, but more to a network of Dutch cities, as the Netherlands is one of the countries where the debate on zoning laws has been more central in the public debate in recent years.

5.4 Tervuren

In 2020, McDonald's applied to open a restaurant in Tervuren, Belgium. The location of this restaurant would have been along a main road that connects Brussels to the rest of the country, but also in proximity of a school. This application sparked the protests of the local residents, who created the "Niet in Tervuren" (Not in Tervuren) movement and started filing objections concerned that this restaurant would have both created further congestions, and been a threat to students' health. This first application got rejected in 2020 due to concerns about the impact on traffic and the local areas.

Three years later McDonald's tried again, with a relocation of the restaurant not far from the original plan. This further application created an even stronger debate, with political parties divided, and the "Niet in Tervuren" committee mobilising even further to prevent the application from being approved. In 2024, the issue was moved to provincial authorities, who eventually denied McDonald's the permit to open, citing unresolved issues from the previous application, such as the anticipated strain on local mobility. As of now (2025), McDonald's has the option to challenge this decision or submit a new proposal, but no further actions have been reported. This case is thus similar to the one in Wicklow, and the analysis of the frames used by different stakeholders can complement what described for the Irish case.

As in Wicklow, this case saw a strong reaction from the local community, with the "Niet in Tervuren" movement which resembles the Irish "No Fry Zone 4 kids". The arguments used to oppose the opening of the fast food restaurant varied. The first thing to stress for Tervuren is that health could not be used as an argument to prevent a restaurant from opening. *As stated by one representative from the municipality of Tervuren*:

"Whether or not McDonald's offers unhealthy food, for example, is irrelevant here. The proximity of several secondary schools in the vicinity of an 'unhealthy fast food chain' cannot be cited as an argument for the refusal of an environmental permit. However, it can be said that this development at this location is an extra burden for a traffic-safe school environment."

And more on this was stressed by other local policymakers, *who reminded that:*

"There is also the European principle of 'freedom of trade'. That makes it difficult for municipalities to intervene. That is why we are asking for legislation that does offer them the option to ban fast food around schools, for example. It is already possible in London and Amsterdam."

In absence of this legislation, local opposition had to find alternative arguments to oppose McDonald's. The first argument used by local activists was **the negative impact on local traffic and related safety hazards for the population** that a *McDonald's would have caused:*

"The advice shows that the application contains many errors. But the most important thing is that the application is not appropriate for that location, and causes a negative impact on traffic. The expected increase in traffic is particularly worrying, because that would pose a danger to the many soft road users of the residential area and the adjacent four schools."

This position *was stressed also by the local green party:*

"McDonald's itself foresees an increase in car traffic of more than 1000 extra cars per day, even more than 1600 on a Friday, and that is probably an underestimate. This makes a highly saturated N3 even more crowded, which negatively affects traffic flow, safety in the immediate vicinity of four schools and air quality. We want more safety for pedestrians and cyclists, especially near schools. With four schools within walking distance, a McDonald's branch in the Carrefour car park goes directly against our attention to road safety with a particular focus on safety on the way to and from school."

Second, even if they knew it could not be picked as argument to prevent the opening of the restaurant, *local activists stressed* the **threats for children's health** that McDonald's would have caused:

"Nevertheless, we would like to insist on a study by Sciensano that states that obesity among school-age children increases when a fast food restaurant is located within a radius of 500 meters around a school." And also that:

"Young people are often not yet fully aware of the impact that fast food can have on their health. It is precisely the presence of those different schools that will only increase the social pressure to visit the McDonald."

There would thus be once again a contrast between what is eaten inside the schools, and *what children can find outside:*

"We are committed to getting healthy schools on track. But you can serve as many healthy snacks as you want in schools, if you plan a fast food joint next to it, it's a wasted effort."

Other researchers pointed out that unhealthy restaurants are a problem not only in proximity of schools, but in all very crowded places:

“We need to keep unhealthy food away from city centres. For a long time, McDonald's didn't dare to venture into small towns and villages, because the competition with classic chip shops or kebabs was too strong. Those days are over.”

This focus on the damages brought by the fast food restaurant was yet questioned by the mayor himself, *who asked:*

“What's wrong with a McDonald's? They say it's unhealthy and competes with the chip shop, but I see it differently. If there were plans for a cultural or asylum centre, half of the village would not be happy with it either.”

Third, with a move very similar to Florence, the movement also stressed that **the beauty of the village** is not compatible with such a restaurant, with *the action committee asking on their website:*

“What is a temple of cheap junk food doing in one of the most beautiful Flemish municipalities? It just doesn't fit.”

The McDonald's would thus not be suited for such a location *where:*

“You would drive into the municipality here past a placard that reads 'fair trade municipality' and a few meters further you would come across a fast food chain that does not fit in with that vision at all. The municipal council likes to pat itself on the back that it is a green and quiet municipality and calls on citizens to support the local economy. However, a fast food chain like McDonald's would give our municipality a completely different look. It is at odds with the vision that the municipal council propagates.”

Interestingly, this focus on the beauty of the village appealed to many, even with local and regional media who often referred to Tervuren as *‘One of the most beautiful villages in Flanders’*.

Fourth, the committee stressed that there is a specificity in **McDonald's products, as they are worse** than *other unhealthy foods sold in supermarkets or shops:*

“A chocolate or smos cheese is different from McDo burgers. They are so fatty, salty and sugary that they are addictive, especially for children and teenagers.”

The problem here is that McDonald's products are capable of getting to children much more *than other foods:*

“Most children are of course seduced by it. That food is full of fat and sugar so that you become addicted. We don't want a branch of theirs here.”

Therefore, health, safety local image dominated the frames used by the local committee against the opening of the fast food chain. The response of McDonald focused on proving that their restaurant was compatible with what requested, especially in the second attempt in 2023, *when according to McDonald's:*

“The restaurant is now further away from the Leuvensesteenweg and from the schools, is less prominently visible and is completely in a green jacket with a green roof, solar panels and a green façade. The safety of pedestrians and cyclists is even better guaranteed and our studies show that the impact on traffic on the Leuvensesteenweg is minimal. With this proposal, we are responding to the many valuable insights that were put forward by local residents, stakeholders, the municipality of Tervuren and the Province of Flemish Brabant.”

The Major of Tervuren, who had stated in 2020 that *the first proposal was not acceptable because:*

"In principle, we are not against a restaurant like McDonald's, because the freedom of economic activity is also important, but in this case too many factors were irreconcilable. [...] It is not against McDonalds's, but against the impact on mobility and the environment."

in 2023 stressed that the proposal *was instead fine because:*

"McDonald's has submitted a new plan with serious adjustments. The location is now on the other side, so it is completely hidden behind a gas station and a belt of trees; So it will hardly be visible from the N3. It is also smaller than in their first proposal. All objections in terms of location and road safety have been taken into account. The nearest house is now at least 50 meters away, whereas previously it was a few meters. There is also a new mobility study that shows that the impact is very limited. A permit could be issued on the basis of all these criteria."

To which the Major added that a McDonald would be acceptable also from the health perspective, *since* it would be **unacceptable to limit their freedom of choice:**

"Obesity among young people is a more complex issue. It's not just nutrition, it's also a lack of exercise and a lot of gaming that makes their lifestyle so unhealthy. [...] Some say that 16-year-olds should have the right to vote, but those teenagers would not be able to resist the temptation of a hamburger? So where does it stop? That's patronizing and way over it."

This point on the liberty of choice is crucial in all the locations described in this chapter. The positions are usually two. On the one hand, a position of non-interference taken by the industries, liberal politicians, and in this case by the local Major, for which we cannot limit individual's liberty of selecting what they want to eat. On the other hand, the necessity to regulate from academics, civil society and more progressive politicians. *As summarised by a nutritionist for the Flemish Institute for Healthy Living*, this position maintains that:

"Freedom of choice is a false argument. Children and young people in particular are not yet resilient enough to make an informed choice. And adults already know better what is good, but even they go for the axe when the unhealthy supply is omnipresent. Then it is no longer a choice. If you argue for choice, you have to make sure that there is real choice. And therefore also more healthy food, because fast food is already far in the majority."

McDonald's also tried to prove that **the proximity of a school was not part of their strategy**, *since:*

"The presence in the vicinity of schools is in no way part of the strategy. The planned location is an existing commercial site with a spacious car park and by planting the restaurant here, we prevent the taking up of scarce open space."

The "Niet in Tervuren" committee did not believe this point, *responding that:*

"In a press release, McDonald's says it does not use a deliberate strategy to target schools. I don't believe them. The plans do not show any extra parking spaces, so they mainly focus on people who come on foot. And who are they? Right, yes."

As for previous cases, McDonald's focused also on the **economic benefits** they bring to the local community. In this case, *they stressed that in Belgium:*

"We currently have 88 restaurants in Belgium, and we have a fairly ambitious expansion plan. [...] While McDonald's is of American origin, in Belgium the restaurants are 100% franchised. That is to say that there are "22 local entrepreneurs" who operate the McDonald's franchise and divide up the 88 restaurants, providing work to 5,400 employees."

To this, the American company added that they were not worried about the local opposition, *framing it as an isolated case*:

"Since the opening of the first restaurant in Belgium in 1978, it's rare, often people are rather happy and demanding. [...] It's true that there are (some opposition movements) underway, for the moment, but it's probably a coincidence that it falls at the same time."

And for what concerns the accusation of **selling unhealthy foods** *they responded that*:

"We're a burger restaurant, and a burger is a burger. It's like when you eat a steak with fries and béarnaise in a restaurant. But we don't do it morning, noon and night. So those who come to us to eat a hamburger, we necessarily leave them the choice. But we offer them alternatives: salads, wraps, vegetarian hamburgers. As for the origin of the products, it is 98% European: we work with Belgian products but Belgium is a small country so there are ingredients that come from France, the Netherlands, Ireland, etc."

Finally, according to McDonald's, even the **traffic concerns were not correct**, *since*:

"Half of our customers are traditionally people who drive by. The preparatory study carried out by Antea, as a recognised EIA expert, shows that the impact on traffic is less than five percent per day. [...] The location of the building will also mean that some parking spaces will disappear, but new green car parks would be built in their place. However, the studies do not show any increased parking pressure due to the arrival of the restaurant."

Despite these arguments, the application was eventually rejected, and most of the decision focused *on the negative traffic impact*:

"The application does not comply with the criteria of good spatial planning. The strong car-orientation is not in line with the municipal policy vision to focus more on pedestrian and bicycle traffic and less on the car. The increase in car traffic at busy times, after school hours, can have a negative impact on road safety for vulnerable road users."

This raised concerns for the major, *who stated that*:

"I do not yet know the reasons for the destruction, but if the deputation has followed the reasoning of the environmental officer regarding mobility, then this is still worrying. After all, that would mean that many other projects would be at stake in the future."

Instead, for others more satisfied for the decision, the case in Tervuren could be used as a first step for the discussion across Flanders, with many stressing this shows *the need to find legal solutions*:

"A local government cannot refuse unhealthy catering establishments, because they must then refuse all catering establishments. It is high time that someone takes this to themselves and that legal solutions are found in the interest of public health."

In sum, there are several parallels between Wicklow and Tervuren. In both cases, McDonald's applied to open one of their restaurants in an area close to a school(s), which sparked the protests from the local community. The latter mobilised efficiently in both cases, putting pressure on their local municipality to find a viable solution to prevent the fast food chain from opening in their location.

In Tervuren, spatial issues, especially related to traffic, helped the local movement "Niet in Tervuren" to block two times the application of the fast food chain. However, this case also demonstrated the need to have legislations at the regional and national levels to help clarifying some of the issues and give municipalities the means to properly intervene. This is why it is interesting to look at the Dutch cases as final example. In the Netherlands, several cities acknowledged how unhealthy areas surrounding schools have become, and they thus decided to implement strategies to reduce the availability of unhealthy foods.

5.5 The Netherlands

Over the last few years, the public health debate in the Netherlands devoted quite some attention to the amount of fast food places around schools. This is part of the discussion on the general impact of obesity on the Dutch population, with *forecasts now predicting* that 62% of the population will be overweight in 20 years if this policy status quo is maintained. This problem affects especially youth, *and it is of particular concern* that this number increased by around 40 percent in just the last decade, number that goes up to 48 in disadvantaged areas.

These percentages concern the whole nation, but certain cities *experience even bigger increases*. For example, neighbourhoods in Rotterdam with a low socioeconomic status have seen an increase of 57% of fast food retails around schools, compared to the urban average of 37%. This creates **health inequalities**, with CSOs stressing that this *is to be expected because*:

"Cheap, tasty but inferior convenience food is extra attractive to people with little money, time, knowledge and skills."

and some *politicians reminding that*:

"We see a gap between people with lower socio-economic status and those with higher SES. [...] We also believe that municipalities should be able to intervene, for example, by easily excluding large fast-food chains and limiting the number of fast-food outlets per area. Because this free, happy liberal market has caused large American fast-food chains to profit off the health of the poorest."

In the Netherlands, several cities – in particular Amsterdam, Rotterdam, Utrecht and Ede - *have decided to take action* against this uncontrolled increased of fast food around schools. As stressed by a professor of obesity, *regulations are necessary because* obesity is a **systemic problem** and not an individual one:

"As long as the food environment tempts us to live unhealthy lives, it is like mopping with the tap open. It is clear that more needs to be done to make the supply healthier." Furthermore:

"Living and staying healthy is not automatic, and in our society, it is incredibly difficult. [...] There are temptations for unhealthy choices everywhere. We have all experienced that when you are outside and hungry, it is often much easier to grab an unhealthy snack than an apple at most places in the Netherlands. The streetscape is changing, and research shows that it is increasingly difficult to make the healthy choice."

All this aggravates the issues with obesity rates, *as stressed by a doctor who said that:*

"Obesity is a socially contagious disease. The eating environment and the culture of eating and socializing makes people fat. People also get used to the fact that others are getting fatter."

The problem is that even though several municipalities acknowledge they have a responsibility to make local food environments healthier, and they would thus like to take action, they also reiterate that they have too little power to act against the opening of unhealthy fast food restaurants. Therefore, Dutch cities requested to have more legislative powers in this regard.

There is not sufficient space in this analysis to give a specific overview. Yet, the core problem is that municipal regulatory tools do not allow for the exclusion of unhealthy food offerings in (parts of) a municipality solely due to the harmful effects of consuming such food on public health. According to some policymaker, this occurred *since*:

"Health does not yet receive enough attention in municipalities. In the past, Amsterdam has also made choices that were more economically oriented than health-oriented. Health is not getting nearly enough attention."

Implementing legislation would thus *require to realise that*:

"There is a battle in the meantime. On the one hand to protect our public health. On the other hand, the often powerful multinationals that are out to sell as much bad and unhealthy food as possible. For years, the government has opted too much for protecting commercial interests and too little for protecting public health. Self-regulation and covenants have often been used to try to solve this. However, it has become apparent that the goals have not been met for years."

As a consequence, some of the actions requested by the cities focused on an amendment to the environments act, in order to broaden its scope to include a definition of safe and healthy food environment. Furthermore, *actions to be taken could rely on*:

- **Zoning plans** capable of establishing minimum distances between schools or other areas and the fast food restaurants. The maximum number of vendors per hospitality category could also determined via these plans.
- **General Local Regulation (APV)**: the problem is that health is not considered as a reason to refuse a permit in the APV, so changing this could bring public health into consideration.
- **Limit to marketing**: Changing the food advertising code (RVV) could limit the amount of marketing certain food retailers can do in proximity of schools and other public places. Criteria could focus on spatial proximity, but also timing (school hours or break time).
- **Procurement Policy**: Municipal procurement policy can set requirements for the food offerings provided to their employees and for certain groups of service users, such as in childcare and social shelters for the homeless.

Politicians promoting the need to implement these measures warned that it is also important to stress firmly that we know how the zoning problem needs to be addressed. Otherwise, we may end up in a **vicious cycle where we wait for more studies to be conducted**, over and over again, and *nothing gets implemented in the meantime*:

"Studies have already been done, and it has already been indicated what changes are needed. So, let's not make the mistake of researching again how municipalities can do this, because that would just delay the system, while scientists have already indicated that there are options. [...] We can't wait any longer. We are now making a call to the municipalities, so let's not delay by conducting more research, but simply seize the opportunities that are available."

The problem stressed by several organisations is that **children behaviour outside school** premises is difficult to influence, *since* as stressed by a politician:

"You really don't want that excess of supply. Eating a hamburger or a döner sandwich is no problem. But I don't want those huge numbers, nor do I want to be in schools or too close to them. I want that to be a well-considered choice, not directed because there is a billboard on every street corner advertising that unhealthy food, and on every street corner there is that temptation with yet another business that sells unhealthy food. That steers your behaviour unnoticed."

Schools representatives voiced as well their concern, as they have plans in place to make school canteens healthier, *but they*:

"Recognize that there is a lot of unhealthy food available around some of the schools. Recently, there are also meal or flash deliverers, which were not there before. Many schools are active in promoting a healthy lifestyle, among other things by offering healthy food in the canteen. The development of fast food supply does not help with that. [...] What students do outside of school hours is of course difficult for a school to influence."

The connection between what done in the schools, and what happens outside is essential, *since*:

"It is of course strange that we do everything within schools to make food healthier, and that there is a lot of fatty food available in the immediate vicinity. Municipalities can really do something, if they want to. [...] But not enough is happening. Such a school is now at its wits' end. They cannot forbid students to leave the premises. And if they can buy such a sandwich a few meters away..."

By eating more fast food, the problem is also that students may develop a **specific taste** for these products, *as*:

"The temptation is great, especially for young people. In this way they learn a wrong taste and eating pattern. The whole of society bears the enormous costs that fat people entail. Hence, the less temptation and more healthy alternatives, the better."

The students themselves tend to confirm this temptation aspect of the food environment, with *one student saying that*:

"It's nice that all those shops are there, but it does tempt me to eat more unhealthy food."

And *another adding that*:

"I don't take my debit card to school because I know I'm going to buy something."

CSOs also stressed that **Commercial Determinants of Health** are seriously hindering municipalities' attempts to create healthier environments. For example, *some criticised that*:

“We are a true junk food paradise where it is apparently considered normal for a fast food giant like Dunkin’ Donuts to open hundreds of new branches, including in schools and hospitals. Is it so bad, hospitals with junk food? Yes, because it is not an isolated issue but a symbol of our society. The government complains bitterly about rising healthcare costs, but prevention – preventing people from getting sick ... is quickly seen as patronizing. Pills are preferred over peppers, while it should of course be the other way around.”

Finally, an economic aspect is also often neglected, namely that **renting places in very crowded areas is expensive**, and thus only big fast food chains *have the means to afford this*:

“If a building has a catering destination and is owned by a commercial party, that party can determine who will be allowed in. The large fast food chains have the budget to pay the high rent in places where large groups of people come. Think of important public transport hubs or around educational institutions. In that sense, it is not surprising that the trend of an increase in unhealthy providers continues. Because if you cannot intervene, nothing will change.”

Industries reacted to oppose the planned bans, offering a variety of frames. The first one is that they believed this is a **simplistic approach to a complex problem**, and that no solution can be found by excluding industries, *as*:

“It is too narrow an approach to a complex problem that is much broader than the menu offerings of specific catering establishments. In fact, a restriction puts us out of the game. It is our commitment to be part of the solution and to contribute to achieving the objectives of the Prevention Agreement.”

This part of the cooperation is what is also stressed by some the liberal politicians, *who support* the argument for which there can be no solution without involvement of the industries:

“I think you need the industry to be able to achieve moderation and to be able to make agreements with it. That table is not set up to arrive at legal provisions, but to have consultations about how we can make things better with regard to moderation. I therefore think it is unwise to dismiss them and thus not allow those consultations to take place again.”

A ban would also neglect that industries themselves are, according to their representatives, **working hard to promote healthier choices**:

“The fast food sector is very aware of the problem of obesity and is taking steps to promote the healthier choice such as reducing the amount of salt, saturated fat and sugar, applying nudging techniques to promote the healthier choice, special attention to children's menus, transparency about the nutritional value and many other great initiatives. In addition, the sector has enormous communication power and sees opportunities to spread the message of a healthy lifestyle widely.”

Industries find the cooperation of liberal politicians also on this point, since the latter often stress how diets are the **result of individual choices** on *which we should not interfere*:

“It’s a bit true that the closer it gets to health, the more personal it is. The individual is the one who stands on the scale in the morning and looks at themselves. The individual is the one who decides whether to eat something or not, and whether to drink something or not. The government cannot intervene that deeply into people’s lives. The question is, of course, whether we should want that. The government is not going to ride our bikes, walk, play tennis, or

football for us. What the government can do is encourage us, help us do those things, and remove obstacles.”

As we noted above, this is a contentious point where NGOs, CSOs, academics and more progressive politicians have a more systemic view. All of these actors stress that there is a significant issue in how the concept of ‘freedom of choice’ is used, *because*:

“Freedom of choice sounds appealing, but many people have no choice at all. Unhealthy food is often cheaper than healthy food. Hundreds of thousands of Dutch people would like to play more sports, but cannot do so because they can no longer afford the sports club's subscription due to the high costs they now incur, or because the sports club itself goes bankrupt.”

Physical activity (lack thereof) is often mentioned by liberal views, *who argue* that:

“We have the task and the challenge to find a better balance in enjoying pleasure products in moderation. There is nothing wrong with a glass of wine, a beer or fries, if there is a balance with an otherwise healthy lifestyle, of which sport and exercise are an important part.”

On top of this, *industries question* both **the possibility to define what is a unhealthy food**, and also that **there are several other providers** who may serve unhealthy food:

“We question the implementation of such a law in practice. There are many legal snags to this. To start with: what is the definition of unhealthy food? How do you formulate unanimous objective criteria for this? And how do you ensure that a level playing field is created with other providers of unhealthy food, including supermarkets?.”

From these premises, *it follows that* according to industries, **legislation is not the solution**:

“Fast food restaurants already want to take steps to promote the healthier choice, legislation is not necessary for this. If legislation is introduced, we argue for a level playing field with other providers of unhealthy food. It cannot be the case that one sector is restricted and other sectors have free rein. In addition, there is still a responsibility for the consumer to make his or her own choices that fit within his or her lifestyle.”

The need to stop legislation is another point on which liberal politicians support the position of the industries, *with the former stressing that*:

“Legislation often doesn’t work. The government cannot regulate everything down to the smallest detail: exactly what we eat, how it’s made, and how it’s placed on the shelves. We would end up with a society that is both unthinkable and undesirable.”

In sum, the Dutch debate on zoning laws encompassed many of the frames presented in the previous three towns. A united front of CSOs, academics, and more progressive politicians both at national and local level acknowledged the need to act to limit the availability of fast food restaurants around school. However, it is clear to all actors involved that cities do not have yet the legislative means to do regulate these environments. The debate that followed thus focused on the need to give cities the tools to contrast the obesogenic environments that have proliferated over the past decades.

As for previous cases, we described that this started a “framing battle” between a ‘regulate side’ promoted by CSOs, NGOs, academics and more progressive politicians, and the ‘do not intervene’ side promoted by the industries and liberal politicians. This challenge between the two views underlines

once again how stakeholders challenge one another to have their frames at the centre of the public debate. In this challenge, only the ones who succeed can then have legislations that pursue their claims. From the description of these four case studies, we can identify some specific issues for which counter-frames can be developed. In particular, it is possible to identify a series of counter-frames that could help with the implementation of zoning laws to protect certain areas of the cities, especially those surrounding schools. Therefore, we conclude this chapter with an overview of these counter-frames.

5.6 Counter frames

From the analysis of the case studies, we identified five counter frames that could be used to promote the implementation of zoning laws.

Freedom of choice does not exist and obesity is not an individual responsibility

Problem

Freedom of choice is used by industries as an excuse to prevent regulations from being implemented. This argument maintains that governments cannot interfere with individual choices, and should thus not intervene by setting rules concerning food environments. For zoning laws, this entails that fast food restaurants should not be forbidden from opening in a certain areas, since this would hinder consumers' freedom to eat what they want.

Counter-frame (already used for the Front of Package Nutrition Labelling)

Policy regulations do not necessarily limit the people's liberty. Public debate is dominated by a biased conception of liberty for which individuals are free only insofar as they are not interfered with in their decisions. In a societal context, this is impossible, as we must negotiate our choices with the liberty of those surrounding us. Plus, the idea for which regulations necessarily restrict individuals' liberty is a neoliberal invention. It is well possible to regulate a system and respect individual liberty at the same time. Industries argue against zoning laws saying that it interferes with people's choices, but this neoliberal argument does not work on several regards:

i. **Absolute freedom as non-interference does not exist in society:** living in society necessarily entails that we must negotiate our absolute liberty with those of others. To do so, we must set rules and regulations. There are several other ways to define liberty, above all the republican conception of freedom as non-domination, for which one is free when no one has the capacity to interfere on an arbitrary basis in your choices. In this framework, regulations and liberty are perfectly compatible. For example, wearing seat belts in the car limits your absolute freedom as non-interference, but it does not limit your freedom as non-domination. You accept that rules are set for your own and societal wellbeing, so this regulation is perfectly compatible with your life in society. In short, the only way to have your liberty as non-interference respected is to live by yourself on the moon. On planet earth, life in society must be regulated.

ii. **Shall we restrict advertisement as well then?**

As the argument of corporates goes, we must let consumers free in their food related decisions. Any argument must be coherent with its premises, so following this non-interference argument we should block all sorts of advertisement as they influence as well food choices. Maintaining that we should not limit fast food retailers from opening, but we should let them advertising their products to influence customers towards purchasing them is simply contradictory. A simple question asking this to corporate lobbies could change the discussion towards public health goals.

1. **What people eat is the result of systemic factors**

Liberal politicians stress that eventually we cannot force citizens to eat certain things, to do physical activity, etc. While it is of course true that eating behaviours cannot be fully controlled, they are influenced by where we live. Food environments exert high influence over individuals, leading the latter to select certain foods over others. The more easily influenceable you are, and the more your choices are swayed. This applies specifically to youth and adolescents. It is for this reason that the food environments where all individuals, and youth especially, spend a lot of time should promote the healthier choice as the easy choice. Simply put, in the current food system, McDonald's and other fast food retailers are temptations to which individuals need to learn to resist. If they are not there in the first place, there is nothing individuals need to resist. From a public health perspective, blocking the opening of fast foods in certain areas is the best way to make sure individuals do not need to resist temptations, which eventually they will often not resist.

We cannot all become endurance athletes

Problem

In the discussions on obesity rates, too often both industries and liberal politicians use the low rates of physical activity as a way to shift the discussion from systemic regulations to individual behaviour. According to this frame, the problem is not that youth consume fast foods outside the school premises, but that they do not do sufficient physical activity to compensate for the calories assumed. The goal is then not to regulate via zoning laws, but to incentivize youth to do more physical activity.

Counter-frame (similar to the one used for Wegovy)

As we specified in the counter-frames on Wegovy drug, the debate on obesity should focus on diets, not on physical activity.

This does not mean that physical activity is not important for health, and that an active lifestyle does not help with weight management. The opposite. Physical activity is absolutely essential for cardiovascular health, metabolic health, muscle mass, etc.. In a nutshell, physical activity improves all the factors that increase longevity. Therefore, it is always important to stress that the more you exercise, the better your overall health. And this is just a part, as the mental and social benefits associated with physical activity are also significant.

However, while many studies show that exercise can benefit weight loss, research also proves that the amount of weight you can lose with just some physical activity is not plenty. And the time you need to invest, is instead significant. An *interesting research by Pontzer* proved this by describing that the total daily energy expenditure of a sedentary American was equal to that of a hunter in Tanzania. Furthermore, he noted that within the hunter group there were significant differences in weight. In this way, he demonstrated that diet intake, and not levels of activity, is the primary factor for weight gain/loss.

Importantly for the discussion here, Pontzer specifies that there are outliers, namely endurance athletes. This group is the only one who does sufficient activity to compensate for calory intake. However, at population level, it is unrealistic to expect that individuals train as endurance athletes do, so at an average of 10/12 hours of intense training per week. Inasmuch, we cannot expect individuals to perform sufficient levels of physical activity to train out a bad diet.

This is an essential point to make sure that the discussion on zoning laws defines precisely the risks of bad diets, and that physical activity is not used by industries as a way to shift the responsibility towards individuals. Physical activity is a pivotal component of health, and incentivizing it at population level is a crucial, and still too neglected, public health measure. However, the raising levels of obesity are primary due to how unhealthy our food environments are, and this is what we ought to target. The discussion on obesity should thus focus on the availability of HFSS foods, and not on how active individuals are.

Healthier jobs can be created as alternative to fast food ones

Problem

As described above, when challenged, fast food restaurants always use the argument of how much they contribute to the local economy. In particular, they focus on jobs, maintaining that opening their activity would create X amount of jobs, thus benefitting the whole community. This is a particularly effective strategy, since a local administration willing to block a fast food from opening can found itself in a difficult position due to the pressure on job creation, especially in disadvantaged areas.

Counter-frames

Jobs are not created in a societal vacuum, but they have to be compared to the impact the specific company that creates the job has on society. There is nothing new in this, and it is just another example of how the problem is framed determines how we discuss about it. For example, the trafficking of illicit substances is an incredibly lucrative activity for criminal activities, and this surely creates a lot of jobs. However, almost no one would accept legalising, advertising and the widespread diffusion of substances like heroin, cocaine, and other hard drugs. Governments have decided that these

substances are so poisonous at societal level, that economic incentives of their legalisation do not counterbalance the harm caused.

When considering the creation of jobs from a company, local authorities must then always analyse which would be the impact on the local community. In the case of the proximity of schools, local municipalities ought thus to consider how many more jobs are worth the health impacts of fast food on youth's health. When the debate is framed considering the health impacts of jobs, then considerations change, and blocking fast food restaurants from opening seems less irrational.

At the same time, as one politician stressed in Florence, jobs are rarely created in a vacuum. One activity opens instead of another, and it is well possible to incentivize other healthier and more sustainable options to open in certain areas. An important point mentioned above is the economic toll of opening an activity in crowded locations. Due to these costs, only big food chains with significant economic resources can afford the investment. Instead, smaller and less powerful activities would be excluded due to their inability to cover the costs. Therefore, on top of zoning laws to prevent fast foods from opening, local municipalities could consider schemes to support the opening of healthy food retailers in locations with many customers.

In short, the job creation frame can always be counteracted by stressing the health impact of fast foods on local activities, and also by underlining that it is well possible to create alternative jobs with a much better societal impact.

Food industry lobbying must be excluded from the policy process

Problem

As described, industries always stress that a solution cannot be found without their involvement, since they always need to be at the negotiation table. On top of this, industries often select a small part of a bigger issue to display they are contributing to finding a solution. For example, they can show their fast food is easily reachable walking or cycling. This helps showing that they are promoting healthier lifestyles, conveniently neglecting that the same location could be close to a big road and that most of the customers would still come from that side. Pretending to be an actor that is willing to contribute to the debate and to be part of the solution, while instead using this opportunity to prevent policy implementation, *is a well documented Commercial determinant of health.*

Counter-frame

As stressed by one politician in the Netherlands:

“If there is one thing we have learned in recent years with regard to prevention, it is that the industry at the table is the biggest possible brake on any progress. We’ve had that for decades. Fortunately, this is no longer the case when it comes to tobacco. We have seen it with alcohol and we still see it with obesity. As long as you have to come to agreements with the industry, which has a direct financial interest in as few measures as possible, it will take forever.”

Local and national policymakers must acknowledge this commercial determinant of health, and be ready to exclude industries from the decisional process. There is a precedent on this with the tobacco industries, who have been excluded from directly influencing EU-level policymakers via the [WHO Framework Convention on Tobacco control](#). In particular, article 5.3. requires governments to protect public health policies from tobacco industry influence. There are good grounds now to compare food industries actions to the ones of the tobacco industry, so policymakers ought to avoid interacting with food industries when deciding on the implementation of the zoning laws.

We know which are the unhealthy foods are, and it is possible to regulate their offering

Problem

Fast foods, as McDonald’s in some of the cases presented above, mention that it is not possible to implement zoning laws because there are several retailers selling both unhealthy and healthy foods. A strategy of some fast foods restaurants is to insert in their menus less unhealthy options (as the salads in McDonald’s) to demonstrate they do not only sell HFSS foods. This is used as an argument to state they should not be prevented from opening, as the customer has always the choice to for example pick the salad over the burger with fries.

Counter-frame

Argument here is connected to the one on the liberty of choice, and the difficulty for individuals to resist the temptations of certain foods. It is of course possible to select the salad – even if we were to overlook the actual content of some of the salads - over the burger with fries. Yet, a quick look at the purchases at McDonald’s, and *one can see that for example salads constitute around 2-3% of the total purchases*. Moreover, these are often bought in addition to other items less healthy.

Purchases of these healthier options have been so low that McDonald has dismissed some of them, which proves once again how unlikely it is that a

healthy option can make a difference if provided amongst many other HFSS foods.

Therefore, *given that we have guidelines developed to define which are the HFSS foods*, it is definitely possible to single out which are the fast foods selling such products, and to then prevent them from opening in certain areas. All this, regardless whether their menu includes certain healthier options or not.

To conclude, we described four case studies where local municipalities tried to implement zoning laws to prevent fast food retailers from opening in their local area, especially in proximity of schools. The main point that emerged is that, aside from Wicklow, municipalities do not have the means to implement legislation only based on public health considerations. This forces cities to find “creative” ways to prevent certain food retailers from opening in their local area.

In Florence, the major relied on the cultural and artistic value of the main square. In Tervuren traffic considerations dominated the debate, and in Ireland and the Netherlands the contention focused on health arguments against economic liberty. In all cases, the debate started thanks to the creation of strong civil society movements, who managed to gather the attention of the political debate. In the three specific cases, rejection side won, and it is possible to notice how this was due especially to how unite this side became, with CSOs, NGOs, local citizens and supportive politicians working together to prevent fast foods restaurants from opening.

The frames used by industries in this case resonate well with the one presented in previous chapters, especially with the debate on the Wegovy drug and Nutriscore. The counter-frames that could be used in these cases thus complement well the ones in previous chapters, offering opportunities to policymakers to respond to a series of diverse arguments.

6 Conclusion

A frame analysis can be beneficial in understanding the policy process, since how actors involved in an issue discuss it will have consequences on the actions that are taken afterwards. This happens because frames describe power dynamics, revealing who are the most influential actors, how they deploy their power, and the connections between decision-makers and other actors. That is, if decision-makers use frames similar to actor A rather than actor B, then it means that A has been more effective in disseminating their frames. It is in this respect that frames can be significant barriers or facilitators to policy implementation.

While the causes for the lack of policy implementation towards healthier and more sustainable food systems both at European and national level are obviously multi-faceted and cannot be entirely connected to the framing of the issue, framing still plays a major role that is too often neglected. The analysis of the four topics considered here thus aimed to prove that this gap can be filled, even though these four topics are only a small section of the many debates currently underway in food systems.

A frame analysis could be extended to several other topics, such as food reformulation, marketing on unhealthy food to children, public procurement of food. Yet, the aim of this work was not to encompass an explanation valid for the whole food system, but to demonstrate the potential of this methodology in the analysis of policy developments, and how it could well be applied to a variety of topics to understand the barriers and facilitators that influence policy development and implementation. In particular, this work aimed to demonstrate that decision-makers can be supported to identify hindering frames, and counteract them via the usage of innovative counter-frames. In turn, the usage of counter-frames follows the balanced intervention ladder – namely that governments and EU institutions must assume the responsibility to make the food systems healthier and more sustainable. Hence, using innovative counter-frames to legitimise policies that better regulate the food system is a necessary step towards the implementation of required policies.

Furthermore, we stressed that while private lobbies have well developed strategies to hinder policy implementation, CSOs, NGOs, public bodies and progressive policymakers seem to struggle to develop equally effective framings. This is not an easy task, since the promoters of the transition towards healthier and more sustainable food systems are a heterogeneous group. As such, they struggle to coordinate with each other. However, this occurs also because the agenda-setting form of power has been for a long time neglected at various levels of governance. This has allowed business driven ideologies to impose themselves in the public debate, while resistance to these ideologies have too often been scarce and ineffective. Developing a frame analysis such as the one presented here could thus rebalance power inequalities in actors' ability to influence the policy and public debate.

While each topic has its own specificities, it was interesting to note that certain counter-frames can be applied to a variety of topics. This is due to the fact that the hindering strategies used by private lobbying are often similar, as *they follow specific methods that were already developed by the tobacco industry decades ago*. If further research extended this analysis to several other topics, it could then be possible to develop **a proper counter-frame manual** that policymakers could use to counteract lobbying by industries. In turn, this could significantly facilitate policy implementation.

The potential of a well-developed frame analysis to understand future policy implementation is significant. However, already these chapters can be put into use into the development of FEAST activities. Within the policy work package tasks, FEAST will organize four policy dialogues. In these meetings, it will be possible to dedicate some time to testing the counter-frames with relevant policymakers. This will offer a precious opportunity to gather feedback on how useful policymakers think counter-frames can be, and to adapt the work accordingly. Part of this work will also be continued

in the communications trainings to be organised for task 7.4., and also in the policy briefs and reports that will be developed as part of WP7.

To conclude, power has different faces, with each influencing policy implementation in several ways. While most debates focus on the most direct forms of power, agenda setting and related framings also have a large influence over policymaking. Bringing these frames to light, better understanding how actors use them, and gathering information on how policymakers are influenced by them is thus essential to describe both how to facilitate policies favourable to a healthier and more sustainable food system, and how to counteract the frames that serve as a barrier to such policies.

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