

Food as a Strategic Sector: Strengthening EU Commitment to Sustainable Food Procurement

Brussels, 24 February 2026

Dear Commissioner Séjourné,
Dear Commissioner Hansen,
Dear Commissioner Várhelyi,

We, the undersigned organisations, are writing in the context of the ongoing revision of the EU Public Procurement Directives. Public food procurement represents an estimated €50 billion annually and plays a pivotal role in shaping the European Union's prosperity, strategic autonomy, resilience, and competitiveness.

When approached strategically, food procurement can generate multiple co-benefits. It can improve access to healthy and nutritious meals, stimulate sustainable production models (including agroecological and organic systems), support small-scale producers and local economies, and promote fair wages, workers' rights, and high animal welfare standards.

We respectfully request a meeting with you to discuss the importance of **recognising food as a strategic sector in the upcoming review of the Directives**. The revised framework should grant specific attention to food procurement, acknowledging its central role in ensuring EU food security, sovereignty, and long-term prosperity.

Despite its potential, strategic and sustainable food procurement remains underutilised in practice due to procedural complexities, legal uncertainties, and administrative burdens. Targeted simplification, while fully maintaining high health, social, labour, animal welfare, and environmental standards, is needed to provide greater clarity, practical guidance, and legal certainty for contracting authorities and economic operators alike.

In this context, we urge you to consider the following recommendations in the revision process:

1. Strengthen the sustainability principle
2. Establish a stronger commitment to minimum sustainability standards
3. Redefine the 'subject-matter' requirement
4. Prioritise quality and best value over lowest price
5. Strengthen and broaden provisions allowing exclusion on the grounds of abnormally low tenders
6. Improve monitoring and data collection mechanisms
7. Invest in the professionalisation of public procurement
8. Enhance structured market engagement

The annex to this letter provides further detail on how unlocking the strategic potential of public food procurement can simultaneously advance multiple EU policy objectives.

We would be pleased to discuss the above further with you at your earliest convenience.

Yours Sincerely,



ANNEX

The public procurement of food, which encompasses 250,000 public authorities, accounts for an estimated 50 billion euros a year¹. It plays a fundamental, strategic role in shaping the EU's prosperity, autonomy, resilience, and competitiveness². Approached strategically, food procurement delivers multiple co-benefits. It can contribute to maintaining the population healthy and can stimulate sustainable production by sourcing organic and agroecological products – which helps address the climate crisis, biodiversity loss, soil degradation, and water pollution. It can support small-scale producers and territorial economies through short supply chains, ensuring fair wages, workers' rights, and animal welfare. The local consumption of seasonal, fresh food can support healthy diets, combat health inequalities and reduce pressure on healthcare systems.

Yet, contracting authorities across the EU continue to struggle. Across procurement more broadly, **only 21% of larger contracts incorporate environmental criteria, even fewer address social aspects, and nearly 60% are awarded exclusively on price³.** This heavy focus on price stems from several factors, one of which is the legal framework for public procurement, regulated by three Directives at the EU level. The revision of the Public Procurement Directives presents an opportunity to change this focus ensuring that **strategic, sustainable, healthy food procurement becomes not a difficult alternative allowed by EU rules, but the encouraged, easy-to-make default option.**

What we call for:

We call on the European Commission to **recognise food as a strategic sector**, propose measures to increase food procurement uptake that support social and environmental goals, and simplify procurement procedures. Specifically, the revision should facilitate a progressive shift toward purchasing healthy food that is grounded in common standards that address environmental, social, nutritional, economic, and animal welfare dimensions. This includes increased uptake of organic, agroecological, higher animal welfare, small-scale food producers, and fair-trade products, while encouraging short supply chains, local consumption, and the provision of fresh, seasonal food. Promoting healthy, sustainable diets, supporting rural communities, and ensuring decent working conditions across supply chains are also critical.

Main demands:

A. Recognise food as a strategic sector

- Public money should be used for the public good, and food is not a commodity like any other. It is also a human right, cultural determinant with a significant impact on natural ecosystems. **The revised Directive should grant special attention to food**, acknowledging its strategic importance for EU food security, sovereignty, and prosperity as recognised by the [Strategic Dialogue on the Future of Agriculture](#), the Commission's [Vision for Agriculture and Food](#), the European Parliament's [INI Report 2024/2103](#), and affirmed by President von der Leyen⁴.

¹ European Commission JRC, [Overview and analysis of sustainable products procurement criteria in the EU food sector](#), 2024;

² Approximately 15.9 million people in the EU are employed in agriculture and the broader food supply chain ([Eurostat 2019](#)). Dietary risks are among the top three risk factors for mortality globally, and the leading behavioural risk factor for non-communicable diseases ([GBD 2019, Eat Lancet](#)). Furthermore, food consumption accounts for the largest share (49%) of the EU's total environmental footprint, followed by housing (18%) and mobility (17%) ([EEA, 2025](#)).

³ IISD, [Strengthening Public Procurement for Climate Action and Competitiveness](#), 2025 (p.18)

⁴ President of the European Commission, ["State of the Union Address 2025"](#), European Parliament, Strasbourg, 10 September 2025.

- We call for the revised Directive to **explicitly recognise the strategic importance of food** and to introduce in the revision an operative provision requiring the European Commission to submit a legislative proposal establishing mandatory sustainability criteria for public food procurement by 2030.

B. Simplify procedures without lowering health, social, labour, animal welfare, and environmental standards

- Strategic and sustainable food procurement remains underused in practice due to procedural complexities, legal uncertainties, and administrative burden. **Targeted simplification should offer clarity, guidance, and legal certainty** to contracting authorities and economic operators.
- However, simplification must not entail deregulation and the lowering of social, labour, animal welfare, and environmental standards. **On the contrary, clearer and stronger standards directly support simplification** by providing contracting authorities with the certainty and tools they need to act with confidence.

Specific recommendations:

I - Strengthen the sustainability principle

- Even in the most ambitious Member States, sustainable procurement only accounts for approximately 16% of public procurement. The sustainability potential of the 2014/24 Directives has remained largely untapped due to the voluntary approach and legal uncertainties.
- We call for the revised Directive to **elevate the sustainability principle (Article 18) to equal standing** with the transparency, equal treatment, non-discrimination, proportionality, and efficiency principles by ensuring consistency between the sustainability requirements and the other Directives' provisions.

II - Stronger commitment towards minimum sustainability standards

- We support the current architecture of the EU public procurement framework, which articulates the horizontal procedural Directive on one side and sector-specific legislation on the other. Yet, regardless of its specificity and strategic importance, food is still lacking its sectoral legislation.
- In light of this and the positive impact of minimum mandatory standards coming from Member States (e.g. Italy and France), we call for an operative provision in the revised Directive requiring the European Commission to submit a legislative proposal establishing **minimum mandatory sustainability criteria for public food procurement** by 2030, accompanied by the allocation of resources supporting buyers in their implementation, drawing on the [Green Public Procurement Criteria](#) and particularly the [JRC Criteria for Sustainable Public Procurement \(SPP\) for Food, Food Services and Vending Machines](#).

III - Redefine the subject-matter requirement

- The current narrow approach to the link to the subject matter is hindering the rollout of strategic and sustainable public food procurement by failing to positively incentivise sustainability performance more broadly.
- Therefore, we call for a **redefinition of the link to the subject matter accompanied by clear guidance on how to include social, environmental, and human rights criteria** as well as provide

explicit legal protection for contracting authorities that prioritise sustainable and strategic procurement decisions⁵.

IV - Prioritise quality over price

- Most tenders are awarded exclusively on price, compromising fair farmers' and farmworkers' remuneration, human rights, animal welfare, and environmental sustainability. Non-price criteria remain underutilized by contracting authorities.
- To reverse this trend and encourage further uptake of strategic and sustainable procurement, we call on the Commission to **require the use of qualitative award criteria** based on the Best Price-Quality Ratio, with a 'comply or explain' mechanism to prevent awarding the lowest price⁶. This should also align with the **adoption of the MAT** (Most Advantageous Tender) Criteria, or at least with a clarification of the current MEAT criteria.

V – Strengthen and expand provisions on excluding on the grounds of an abnormally low tender

- The Commission's Evaluation has shown that contracting authorities face difficulties in interpreting the provisions on excluding grounds (Article 57) and on abnormally low tenders (Article 69)⁷.
- To address this issue, we call for the revised Directive to **extend Article 18(2) obligations throughout the supply chains, while strengthening the excluding grounds** by triggering mandatory exclusion when there is a serious and repeated breach of applicable social (incl. labour standards and respect of bargaining agreements), environmental laws and Human Rights, Article 69(3) on abnormally low tender should also be clarified.

VI - Improve monitoring and data collection

- As shown by the Commission's evaluation, there is insufficient data on the positive impact of strategic and sustainable procurement. This lack of data causes serious knowledge gaps and limits evidence-based policies.
- We call on the Commission to **streamline and integrate reporting and monitoring mechanisms** by establishing EU-wide reporting channels for sustainable public procurement, leveraging existing e-procurement tools and feeding data into the Public Procurement Data Space.

VII - Invest in the professionalisation of public procurement

- The adoption of strategic and sustainable food procurement depends not only on the legal framework but also on the skills, knowledge, and competencies of contracting authorities and procurement officers. Accordingly, we call on the Commission to further **invest in the professionalisation of procurement**.
- Specifically, we demand that the Commission empower national and regional competence centres with mandates and resources to provide operational guidance, toolkits, and ex-ante advice. Create dedicated thematic helpdesks (e.g. innovation, food, circular construction), building on the EU GPP

⁵ To maintain the balance between the sustainability principle and other fundamental principles of public procurement law, the revised framework could limit the maximum weight of criteria that are not directly linked to the subject matter requirement.

⁶ With exceptions e.g. for those buyers already using such qualitative criteria at the selection stage.

⁷ The need to move away from procurement based on the lowest-price criteria has been endorsed by the European Parliament INI 2024/2103.

Helpdesk model and the Public Buyer Community. Scale up EU-wide Communities of Practice and peer learning, complemented by hands-on advisory services for live procurements.

VIII - Strengthen market engagement

- Pre-procurement market engagement enables contracting authorities to explore solutions with suppliers, anticipate challenges, and enhance participation by SMEs and small-scale farmers.
- We call the revision to amend Article 40 and introduce a clear roadmap on the use of: (a) the need identification phase, and (b) subsequent open market consultations. This will ensure contracting authorities systematically assess unmet needs, increase effective competition and reduce lock-ins in outdated solutions.

Conclusion

Food must not be forgotten in this revision. It represents a key and strategic sector for EU food security, sovereignty, and prosperity. The revision of the Public Procurement Directives is an **opportunity to unlock its transformative potential**, supporting farmers, nourishing citizens, and contributing to Europe's autonomy, resilience and sustainability goals. We urge the Commission to seize this opportunity.