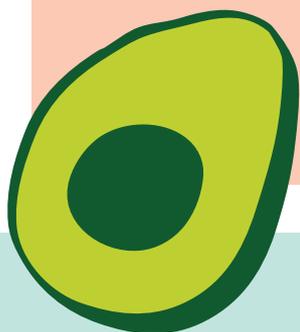




Criteria for Sustainable Public Procurement (SPP) for Food, Food services, and Vending Machines

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Abstract

The European Commission aims to reduce the environmental and climate impact of the EU food system while cultivating a prosperous agricultural and food sector for future generations. This commitment is outlined in the European Green Deal and reaffirmed in the Vision for Agriculture and Food adopted on February 19, 2025. A key action in this vision is to enhance the role of public procurement for food.

Incorporating sustainability aspects in public food procurement implies a comprehensive understanding of food systems, addressing environmental impacts, public health, social benefits as well as competitiveness and innovation. Public authorities need to procure food and services that offer the best value for money, while incorporating sustainability objectives in their operations. Criteria to be included in public tenders thus need to be drafted strategically, also accounting for specific market conditions.

This report presents potential sustainability criteria for public procurement of food, food services, and vending machines, serving as inspiration for public authorities who want to offer healthy and sustainable food and wish to reward sustainability efforts by European farmers, the food industry, and service providers in their procurement projects. The criteria are presented as a comprehensive list encompassing the three dimensions of sustainability: environmental, social (including health, nutrition, and animal welfare), and economic. Competent authorities and contracting entities can voluntarily incorporate these sustainability criteria into tenders, adapting them when necessary to meet specific priorities and needs. Where appropriate, the criteria are accompanied by implementation suggestions or concrete examples of sustainable public procurement to illustrate their application in practical contexts.

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1 Introduction

The Joint Research Centre of the European Commission (JRC) developed voluntary **criteria for sustainable public procurement for food (SPP)**, following scientific and technical analysis. These criteria cover the environmental, social (including health and nutrition, and animal welfare), and economic dimensions of sustainability. This list of criteria can be used by national and regional authorities, public procurements specialists, and other key stakeholders responsible for implementing sustainable practices in public food procurement.

Voluntary green public procurement criteria for food, catering services and vending machines (GPP), referring to the environmental dimension, already exist at EU level since 2008. By coherently integrating the environmental, social (including health and nutrition, and animal welfare), and economic sustainability dimensions, SPP could play a key role in shaping production and consumption trends (García-Herrero et al., 2024; Casonato et al., 2024).

The introduction of such criteria has the **potential** to stimulate the transition towards a more healthy and sustainable food system, and to reward sustainability efforts made by European farmers, food industry and food services as recognised in the Vision for Agriculture and Food (European Commission, 2025a). The criteria can enable public authorities in Member States (MSs), regions, and cities, to source sustainable food in multiple settings, such as schools, hospitals and other public institutes. **Public procurement for food and food services can also stimulate food system actors to shift to more sustainable production practices and can significantly influence food demand** (Agora Agriculture & IDDRI, 2025). The introduction of SPP can further support sustainable production systems, such as organic farming and sustainable fisheries, by boosting demand. It can provide opportunities for Small and Medium Enterprises (SMEs), particularly those involved in short supply chains, thus strengthening the link between urban and local rural communities. This could diversify the food supply chain and strengthen food security. At consumption level, it would contribute to a healthier food environment and has the potential to encourage the adoption of healthy and sustainable diets and reduce food waste. Educational environments, such as schools and kindergartens, are especially important in the implementation of sustainable food procurement which can contribute to food education and reduce inequalities.

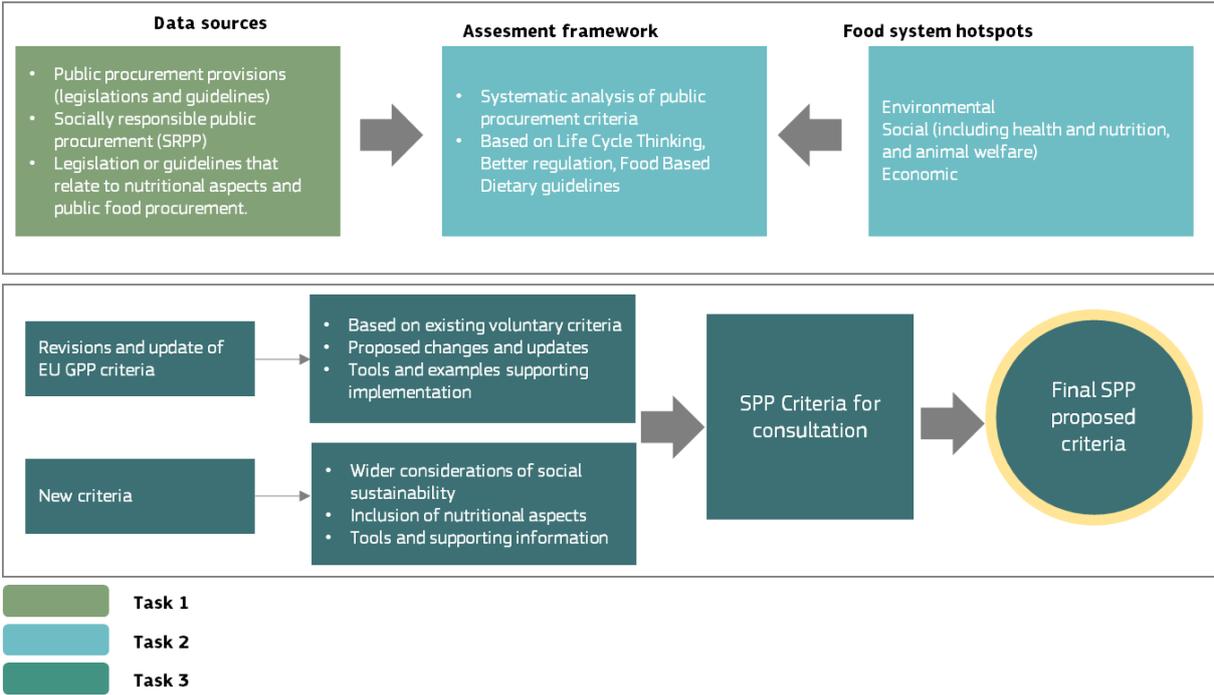
Population health is an essential component of sustainability, as it directly affects the well-being of individuals and communities. The consequences of unhealthy diets in the EU are far-reaching, impacting individuals, healthcare systems, and economies. These impacts include increased prevalence of non-communicable diseases (NCDs), higher strain on healthcare systems and expenditure, more social disparities¹, and detrimental environmental impact. Consequently, integrating health considerations into public procurement processes is vital for fostering a more sustainable future (FAO, 2023; Willett et al., 2019). The integration of **dietary guidelines** in public procurement processes is a powerful policy tool to improve population health by aligning diets with dietary recommendations and promoting healthier food choices (WHO, 2021a). Prioritising foods that contribute to healthy diets and limiting the availability of options that lead to unhealthy consumption patterns in public institutions can contribute to a healthier food environment and raise awareness about the importance of healthy eating (WHO, 2022a). This leading role of public institutions can result in increased awareness which can positively influence dietary habits outside the canteen, leading to long-term healthier dietary patterns in the population.

¹ European Commission. EU burden of non-communicable diseases: Key risk factors. Available at: https://knowledge4policy.ec.europa.eu/health-promotion-knowledge-gateway/eu-burden-non-communicable-diseases-key-risk-factors_en . Accessed date: 21 August 2024

This document includes **a list of voluntary criteria for sustainable public procurement** for food, food services and vending machines. The analysis is based on extensive review of relevant literature and experiences already ongoing at MS level (García-Herrero et al., 2024), underlining the richness and variety of measures already in place. These criteria can contribute to a more homogeneous uptake of SPP criteria across MSs, with a maximum potential for demand for products and services that are more sustainable than the market standard, further fostering sustainability and leading to potential economies of scale.

An overview of the different tasks carried out in the present JRC project is presented in **Figure 1**.

Figure 1. Overview of the work.



Source: Authors' own elaboration.

After a first step analysing data sources in the food, food services, and vending machines public procurement domain (Task 1), the JRC analysed existing public procurement provisions (criteria, tools, legislation, and guidelines) for food in Europe, focusing on sustainability related aspects (Task 2). The analysis included food, food services (e.g. catering), and vending machines and was structured as follows:

- **Development of an assessment framework** to understand the possible **environmental, social (including health and nutrition, and animal welfare), and economic impacts** of existing procurement provisions from MSs, highlighting key areas needing improvement to enhance sustainability. The framework was based on **Life Cycle Thinking** and **Life Cycle Assessment (LCA)** to assess environmental and social impacts. The framework was complemented by the potential economic and social impacts of policies as included in the Better Regulation Toolbox (European Commission, 2023a). Social impacts related to nutrition were also identified as a crucial component for achieving sustainability, as they directly influence individual and community well-being.

- **Hotspots analysis**, based on a data collection, primarily based on a contracted study (described in Lermant et al., 2024), which involved a desk research and targeted stakeholder consultation, supplemented with in-house research, resulting in a **catalogue of existing criteria** for sustainable food procurement **across EU MSs**. The analysis helped in determining which aspects of sustainability are already incorporated in public procurement criteria and which are not. This extensive analysis was purely qualitative and hence did not aim at quantifying the specific impacts related to the implementation of the different criteria.

The methodology and the detailed results of the analysis can be found in García-Herrero et al. (2024), representing Task 2 report of the present project.

Based on these elements, **a set of voluntary criteria** covering various levels of ambition for achieving sustainable food procurement **has been developed** by the JRC (Task 3); the criteria went through an internal consultation process with other relevant Commission services as well as a targeted consultation with relevant stakeholders (Annex 1), before being finalised in this report. The description of these criteria is the core of this report.

1.1 Structure of the document

This report includes a **list of voluntary, potential SPP criteria for food, food services and vending machines**.

The development of the criteria **builds on the existing EU GPP**, which mainly deals with environmental aspects, and includes **economic and social (including health and nutrition, and animal welfare) aspects of sustainability**. This fosters a more cohesive view of the food system by acknowledging that sustainable food procurement can be reached through the application of criteria in tenders but also through other aspects, such as having overall objectives and strategies or providing training and tools to public authorities. These considerations go beyond the neat division in different sectors and product groups (food, food services and vending machines), promoting a comprehensive perspective to improve the overall sustainability of food purchased and served.

The current adoption of green or sustainable public procurement by public authorities has a significant knowledge gap as the precise uptake is unknown. Stakeholders often highlight the lack of tools, skills and operational guidelines to implement the criteria. In order to move towards a more operationalised application of the criteria, this document couples the criteria with tools and examples of best practices. Moreover, to make information more accessible, the language is simplified whenever possible.

This document is structured as follows. First, the food system perspective for public procurement provisions is introduced (chapter 2). Then, chapters 3 to 5 present specific criteria which can apply to food, food services and vending machines, following the approach adopted in the EU GPP provisions. SPP criteria which cover multiple sustainability dimensions and can be applied horizontally in different food environments are described in chapter 6. These include some criteria that can apply regardless of the organisation of the procurement, i.e. menu planning for healthy and sustainable meals (including nutrition), food waste prevention, and monitoring of sustainability indicators. GPP criteria for which no changes are proposed are recalled in chapter 7. The document concludes with possible further supporting tools in chapter 8, including life cycle assessment; guidelines and strategies for implementing nutritional criteria; monitoring and evaluation; market dialogue; stakeholder participation and involvement. As supplementary materials, Annex 1 reports information on the targeted stakeholder consultation of the draft list of criteria; Annex 2 includes a

list of best practices, tools and examples to support SPP implementation; Annex 3 deep dives on the topic of short supply chains.

In the report, the criteria are presented in the form of Technical Specifications (TS), Award Criteria (AC), Contract Performance Clause (CPC) and Selection criteria (SC) (see Glossary in chapter 1.2). Moreover, in some criteria, ‘option A’, and ‘option B’ are included, to indicate different ways to formulate the criterion.

In particular, the criteria listed in this document include:

- Modifications to existing EU GPP criteria when information is deemed outdated or requires clarification. In this case, the original type of criteria is maintained (TS, AC, CPS or SC).
- New criteria covering socio-economic issues in the form of TS and AC, and complementing existing environmental criteria in the form of AC.

All the changes and proposals for SPP criteria are summarised in **Table 1**.

Table 1. Overview of main actions taken for each listed SPP criterion.

Scope of procurement	Source	Aspect covered by the criteria in this report	Main proposed action
Food	EU GPP (2019)	TS 1/ AC 1 Organic food products	Simplify wording, extend eligibility
		TS 2 Fishery and aquaculture food products	Review applicability of comprehensive criteria and inclusion of animal welfare
		TS 3-7/AC 2 Animal welfare	Increase the scope of the technical specifications
		AC 25* Fair and ethical trade products	Complement with CPC on working conditions
		TS 9/AC 3 More environmentally friendly vegetable fats	Add information on certifications
		Not specified - Agricultural products labelled with geographical indications	No change proposed
	New propositions	AC 4 – AC 8 Other sustainable agricultural practices (in addition to organic)	AC targeting agricultural management
		CPC 1 Working conditions along supply chain and Reserved contracts for social enterprises on working conditions and inclusion of vulnerable groups in primary production, transportation, and processing stages	Proposal of adding CPC and other reserved contracts
		CPC 2 Short supply chains	New criteria and/or possible additional considerations on facilitating farmers’ access to contracts
		TS 11-30/AC 10-23/ CPC 8 Nutritional criteria	New criteria
Food services	EU GPP (2019)	SC Competences of the tenderer	Update wording
		CPC 3 Staff training	Detailed information on type of trainings

Scope of procurement	Source	Aspect covered by the criteria in this report	Main proposed action
		TS 11/AC 10 / CPC 8 Plant-based menus	Integrate nutritional criteria to promote healthy and sustainable meals (see below, now indicated as a horizontal criteria)
		TS 31 /AC 24 Food waste prevention and prevention innovation	Update wording and provide tools and examples (now indicated as a horizontal criteria), inclusion of innovation for food waste prevention
		EU GPP: TS 4.1/TS 4.2 Other waste: prevention, sorting and disposal	No change proposed
		EU GPP: TS 5.1/ TS 5.2/TS 5.3 / AC 1.1 / AC 1.2 Chemical products and consumable goods	No change proposed
		EU GPP: TS 6.1/ AC 2.1a/ AC 2.1b/ AC 2.1c/ AC 2.2 /AC 2.3 Energy and water consumption in kitchens	No change proposed
		EU GPP: TS 7.1/ TS 7.2/ AC3.1/ AC 3.2/ AC 3.3/ AC 3.4 Food transportation	No change proposed
		EU GPP: CPC 1 Provision of low impact drinking water	No change proposed
		EU GPP: CPC 2 Purchase of new kitchen equipment	No change proposed
		EU GPP: CPC 5 Food and beverage redistribution	No change proposed
	New propositions	AC 9 Monitoring of environmental impacts	New criteria
		CPC 4 Traceability	New criteria
		CPC 5 Working conditions and inclusion in food services and reserved contracts for social enterprises	New criteria and reserved contracts
		CPC 6 Food environment (accessibility/communication)	New criteria
		CPC 7 Participation in awareness raising and education activities	New criteria
	Vending machines	EU GPP (2019)	EU GPP: AC 2 Fair and ethical products
EU GPP: TS 2 More environmentally friendly vegetable fats			No change proposed
EU GPP: TS 1/ AC 1 Organic food products			No change proposed
EU GPP: TS 3 Smart controls			No change proposed
EU GPP: TS 4 Reusable cups			No change proposed
EU GPP: AC 3 Annual energy consumption			No change proposed
EU GPP: AC 4 Energy Consumption and GWP of refrigerants			No change proposed
EU GPP: CPC 1 Purchase of new vending machines			No change proposed

Scope of procurement	Source	Aspect covered by the criteria in this report	Main proposed action
	New propositions	TS 10 Nutritional criteria and considerations on the food environment	New criteria
Horizontal	New propositions <i>(can be applied whether food services or food are purchased)</i>	TS 11-30/AC 10-23/ CPC 8 Healthy and sustainable meals	New criteria incorporating different aspects in menu planning (plant-based menus and nutrition)
		TS 31 /AC 24 Food waste prevention and prevention innovation	Update wording and provide tools and examples (now indicated as a horizontal criteria), inclusion of innovation for food waste prevention
		TS 32 Monitoring	Highlight the importance of monitoring

Coloured cells are those for which changes from the existing EU GPP criteria have been made. *This labelling was corrected after publication, as this criterion had been erroneously indicated as TS 8. Note that TS 8 is not used. Source: Authors' own elaboration.

Each criterion is presented according to the structure outlined in Table 2 below. For nutrition, which consists of entirely new criteria, the criteria have been designed as a combination of findings from García-Herrero et al. (2024) and the incorporation of the latest dietary recommendations, with supporting references where needed.

Throughout the report, criteria are presenting using “shall” when describing their application to ensure alignment with potential legal drafting. When the criteria are derived on the basis of an existing EU GPP criteria, changes are highlighted in grey and underlined. Note that this formatting would thus also apply to the newly added tools or examples. Fully new criteria have instead standard formatting.

Table 2. Main aspects covered in the listed criteria.

Rationale: The reason why a proposal is made in SPP, whether to adjust a current criterion or to propose a new one, and substantiation of the criterion/criteria proposed.	
Objective: what can be achieved with the application of the criterion.	
In some cases, further research and analysis is signalled as a proposed action, since sufficient relevant information could not be retrieved in the present analysis. In the further development of the criteria, it is advised that these research and knowledge gaps are addressed to ensure applicability and feasibility of criteria.	
Gaps identified from the technical analysis	Proposed actions
List of identified gaps from the technical analysis, literature review, and stakeholders' assessment.	Identified actions based on the gaps, e.g.: <ul style="list-style-type: none"> propose a new criterion (TS, AC, CPC). redraft the text. Other. Further actions to be considered beyond the scope of this report: Actions that go beyond the scope of the report, such as: <ul style="list-style-type: none"> carry out further research to support the implementation.
Title of the criterion	
Proposed text of the criterion	
Proposed mean of verification	
Best practices and examples (when available)	

Source: Authors' own elaboration.

1.2 Glossary

This subchapter shows the specific nomenclature used throughout the document.

Terminology related to food

Plant based: The WHO defines plant-based diets as “a diverse range of dietary patterns that emphasise foods derived from plant sources coupled with lower consumption (or exclusion) of animal products. Vegetarian diets are a subset of plant-based diets, which may exclude the consumption of some or all forms of animal foods. Vegetarian diets include: vegan, lacto-vegetarian, lacto-ovo vegetarian, ovo-vegetarian, pescatarian, semi-vegetarian (flexitarian)” (WHO, 2021a). For the purpose of this report, plant-based diets or meals include meals, recipes, and menus with a low amount of animal products and a high amount of vegetables and fruits, whole grains, legumes, and nuts and seeds.

Fishery and aquaculture products: Aquatic organisms resulting from any fishing or aquaculture activity, or products derived therefrom.

Red meat: Red meat refers to all mammalian muscle meat, including, beef, veal, pork, lamb, mutton, horse, and goat (WHO, 2015a).

Processed meat: Processed meat refers to meat that has been transformed through salting, curing, fermentation, smoking, or other processes to enhance flavour or improve preservation. Most processed meats contain pork or beef, but processed meats may also contain other red meats, poultry, offal, or meat by-products such as blood. Examples of processed meat include hot dogs (frankfurters), ham, cooked and dried sausages, corned beef, and biltong or beef jerky as well as canned meat and meat-based preparations and sauces (WHO, 2015a).

Level of food processing (fruits and vegetables): Processed food refers to the following definition “This category covers dried, canned, bottled fruits and vegetables, fruits and vegetables in vinegar, oil, or brine; fruit and vegetable preparations and jam, jellies and marmalades and similar products”.

Unprocessed food: Food which has not undergone any treatment resulting in a substantial change in the original state of the food, for which purpose the following in particular are not regarded as resulting in substantial change: dividing, parting, severing, boning, mincing, skinning, paring, peeling, grinding, cutting, cleaning, trimming, deepfreezing, freezing, chilling, milling, husking, packing or unpacking (Art. 3.2(d)) (European Commission, 2008).

Terminology related to procurement

Subject matter of a contract: It refers to what good, service or work is intended to be procured. It can consist in a description of the product but can also take the form of a functional or performance-based definition.

Technical Specification: The content laid out in Technical Specifications constitutes the minimum compliance requirements that all tenderers need to ensure to participate in the bid. It must be linked to the contract's subject matter and must not concern general corporate practices but only characteristics specific to the product/service being procured. Link to the subject matter can concern any stage of the product's life cycle, including its supply-chain, even if not obvious in the final product, i.e. not part of the material substance of the product. Offers not complying with the technical specifications must be rejected. Technical specifications are not scored for award purposes; they are strictly pass/fail requirements.

Award Criteria: At the award stage, the contracting authority evaluates the quality of the tenders and compares costs. Contracts are awarded on the basis of most economically advantageous tender (MEAT). Everything that is evaluated and scored for award purposes is an award criterion. As technical specifications, also award criteria must be linked to the contract's subject matter and must not concern general corporate practices but only characteristics specific to the product being procured. Award criteria can be used to stimulate additional environmental performance without being mandatory and, therefore, without foreclosing the market for products not reaching the proposed level of performance.

Contract Performance Clause: These are used to specify how a contract is to be carried out. Contract Performance Clauses can function either as Technical Specifications or as Award Clauses, depending on their role in the contract. If working as a Technical Specification they describe how a contract must be performed (i.e. they are mandatory requirements). If working as an AC then they are used to evaluate and select the best bid (i.e. extra points will be awarded to the tender if the contract is performed respecting the specified requirements). Contract Performance Clauses must be linked to the contract's subject matter and must not concern general corporate practices but only those specific to the product being procured. The economic operator may not be requested to prove compliance with the contract performance clauses during the procurement procedure, but compliance with contract performance clauses should be monitored during the execution of the contract, i.e. after the contract has been awarded. It may be linked to penalties or bonuses under the contract in order to ensure compliance.

Selection Criteria: They refer to the tenderer, i.e. the company tendering for the contract, and not to the product being procured. They may relate to suitability to pursue the professional activity, economic and financial standing and technical and professional ability and may- for services and works contracts - ask specifically about their ability to apply environmental management measures when carrying out the contract.

2 Public Procurement for a sustainable food system

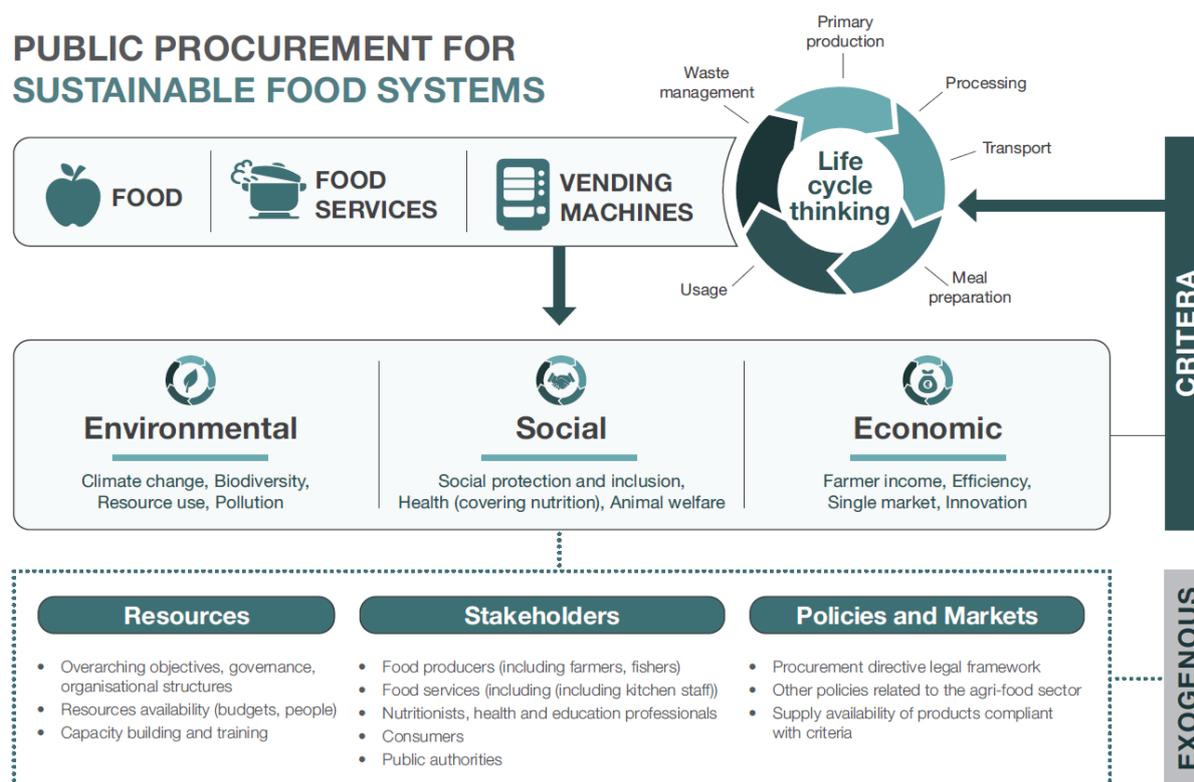
The food system is characterised by strong interrelations among supply chains, consumption patterns, ecosystems, our health, and the planet. Therefore, it is crucial to prioritise environmentally friendly and ethically sourced goods that protect ecosystems and safeguard human, animal, and environmental health, as recognised in the One Health Approach and the Vision for Agriculture and Food. Transitioning to a sustainable food system requires adopting a system perspective that acknowledges the interlinkages across its elements. These links are documented in scientific literature and are central to the Commission's European Green Deal, reaffirmed in the Vision for Agriculture and Food, and part of the broader agenda to achieve the United Nations' Sustainable Development Goals (SDGs).

Sustainable Public Procurement (SPP) can act as a powerful tool to foster transitions towards sustainability in the food system. The first expected outcome is straightforward: following the implementation of specific criteria and procurement practices, public authorities are expected to procure and offer more sustainable food. This would incentivise the supply chain to enhance the sustainability of their products, including efforts made by all food system actors such as farmers and industry, and facilitate the adoption of healthier diets from sustainable sources. Indirect effects of this demand pull are also expected, stimulating the market's offer for sustainable products and services. This would further contribute to improving the availability and access to sustainable food in non-public settings, thus promoting sustainable choices by food system actors and encouraging sustainable diets. SPP can also contribute to shaping a favourable and transparent food environment, steering sustainable consumer behaviour (especially in schools), and ultimately increasing the sustainability of the entire value chain.

The main aim of this report is to propose **a list of SPP criteria**. National, regional, and local authorities can use these criteria to incorporate sustainability aspects into public contracts. Contracting authorities can also adapt these criteria for their tenders in procurement procedures, serving as a guide when writing tenders. The listed SPP criteria are meant to be chosen and applied according to each contracting authority's capability and market environment. The implementation and expected functioning and impact of the criteria should be considered together with other SPP-related elements (such as governance, organisation, and training), as well as exogenous factors, such as other food system policies, budgetary constraints, or general market dynamics.

It should be noted that, in addition to SPP criteria, there are many additional policy instruments that influence sustainable consumption. These range from agricultural policies to environmental measures such as the reduction of single-use packaging, to specific food safety issues, and are implemented at local, national, and EU levels. The drafting process attempted to account for existing policy tools to reach sustainability objectives to the extent possible. They consider the environmental, social (including health and nutrition, and animal welfare), and economic dimension.

Figure 2. A broader perspective: public procurement for sustainable food systems.



Source: Authors' own elaboration.

The criteria selection was informed by comprehensive **hotspots analysis** across the whole value chain and sustainability dimensions. This helped highlighting the most relevant areas of sustainability, including those not or only partially addressed by current EU GPP criteria. Current GPP criteria address comprehensively environmental impacts, although they focus particularly on climate change and biodiversity loss.

Being voluntary, the effectiveness of the GPP measures put in place is hard to estimate. Available data show that there is a positive, but very heterogeneous, trend in GPP **uptake** in the EU (Garcia-Herrero et al., 2024). Several countries and municipalities strongly support purchasing organic and certified products, food waste reduction measures and more plant-based menus in catering. SPP criteria would provide environmental benefits, while encouraging public authorities to apply a **more systemic view** of food procurement. For example, by incorporating nutritional aspects in sustainable meal planning, possible trade-offs and synergies between sustainability dimensions can be anticipated, as plant-based menus with lower meat quantities could result in lower costs, which could enable the purchase of products with price premiums, such as organic food (Sanyé Mengual et al., 2024a; Simon et al., 2022; Nuutila et al., 2019).

This report **does not mandate a prioritisation** of the criteria presented, at this stage. However, it indicates that the application of some horizontal criteria, such as menu planning for healthy and sustainable meals and food waste prevention, are fundamental to contribute to the transition to a more sustainable food system. The application of such criteria is recommended across the public sector, regardless of what good or service is procured.

A final aspect concerns measures to support the **actual uptake of criteria**. Gradual and incremental implementation of criteria can be beneficial for effective implementation. As brought forth by scholars and stakeholders, adequate **training** as well as available **support and tools** are

key enablers of uptake and require further development. The present document concludes with a dedicated section on possible tools and recommendations to support the adoption of SPP criteria (chapter 8). The inclusion of these tools and examples is seen as necessary as criteria need to be part of broader procurement policies and strategies. Setting clear objectives in policy and organisational strategy should be the first step towards sustainable public procurement (Lindström et al., 2022; Simanovska et al., 2020).

Among the proposed tools in support to SPP, this report includes **Life Cycle Assessment (LCA)**, and specifically the with the Environmental Footprint (EF) methods as recommended by the Commission (European Commission, 2021a). The application of a standard method ensures compliance with broader environmental policy. Moreover, LCA has been a pivotal methodology in this research: first, to identify hotspots for transitioning to sustainable food systems, consistently with the former drafting the current EU GPP criteria; second, as a recommended tool for coherent environmental performance monitoring in selected award criteria. LCA, allows to compare products for informed decision-making concerning their environmental impact across the supply chain, as it considers all stages of a product's life cycle - from raw material extraction, production, transportation, and use to end-of-life disposal. The enhanced understanding of environmental impacts brought by LCA needs to be combined with adequate resources and skills to be properly used and interpreted. While some limitations persist in the application of LCA to food systems, as certain positive externalities of specific farming practices or fishery activities are not yet fully captured (Brown et al., 2025), LCA has been used extensively in food system analysis and can support the application and evaluation of SPP.

Further key tools included in this report aim to strengthened **monitoring and evaluation**. As widely recognised by available evidence, increasing the monitoring capacity is fundamental to understand if procurement criteria are being implemented in tenders and eventually to assess the actual impacts. In addition, the report highlights the importance of **market dialogue** as a key process to facilitate the interaction between contracting authorities, suppliers and other stakeholders before the start of the public procurement procedures.

3 Food

This chapter presents the core criteria for Food, starting from the revisions and adaptations of existing EU GPP criteria (chapter 3.1) and new listed criteria (chapter 3.2).

3.1 Revisions and adaptations of existing EU GPP criteria

Proposed changes on the existing EU GPP criteria are highlighted in grey and underlined. The general structure of the GPP criteria has been kept (for example, in those cases where core and comprehensive criteria are listed²) to facilitate discussion at this first stage. Further simplifications might be proposed. The horizontal criteria presented in chapter 6 of this report are also relevant to the procurement of food and can be taken into consideration by contracting authorities.

3.1.1 Organic food products

Rationale: Organic food production is often associated with a lower environmental footprint with respect to conventional production (Boschiero et al., 2023). Moreover, it can lead to social and economic benefits, specifically targeting improved animal welfare, producer remuneration and territorial cohesion/rural development (Magnano et al., 2024). Organic food procurement is the oldest element of green and sustainable public procurement in Europe, as already analysed by previous research (Testa et al., 2012; Sanyé Mengual et al., 2024a). The importance of organic procurement has been recently reiterated in the Vision for Agriculture and Food (European Commission, 2025a), which indicates this policy measure as useful demand side incentive. Nonetheless, it has been highlighted especially by stakeholders how procurement thresholds introduced at MS level often do not match the actual supply of organic food products. Starting from the current EU GPP criterion, additional language to foster a reduction in the gap between supply and demand is thus introduced. Allowing these producers in conversion - according to the regulation 2018/848 (art. 10) - to participate in public procurement could accelerate the growth in domestic supply of organic products. In addition, progressive thresholds could allow for more flexibility for contracting authorities who have difficulties in sourcing certain organic food products. **Market dialogue** is a useful tool to establish thresholds and to understand which organic food products to prioritise (see chapter 8 for further information).

Objective: Propose less environmental impacting food products by supporting the development of the market for organic products in a progressive and sustainable way, enabling a wider uptake for diverse products and contexts.

² Core and comprehensive criteria description are only provided in criteria directly taken from the EU GPP (Boyano et al., 2019). Core criteria are designed to allow easy application of GPP, focussing on the key areas of environmental performance of a product and aimed at keeping administrative costs for companies to a minimum. The Comprehensive criteria take into account more aspects or higher levels of environmental performance, for use by authorities that want to go further in supporting environmental and innovation goals.

Table 3. Gaps and proposed actions in organic products.

Gaps identified from the technical analysis	Proposed action
<ul style="list-style-type: none"> — Stakeholders have highlighted how supply is sometimes insufficient to meet the EU GPP threshold ranges, especially for certain products and regions: <ul style="list-style-type: none"> ○ There is often a gap between supply and demand – certain MSs do not have the capacity to grow organic food, which results in sourcing it also from outside Europe. Possible thresholds and products should be based on market analysis in each situation. ○ It is highlighted that producers undergoing organic conversion cannot currently be included in the TS/AC on organic food products. — Further analysis on the effect on prices of the application of different criteria at the same time is necessary. Research has shown that increasing organic food procurement, together with a reduction of animal-based products (plant-based menus), does not lead to an increase in the cost of the meal. — The indication of the threshold can have different effects based on the reference unit, i.e. whether this is indicated in mass or economic value. Real world data would be necessary to understand the effect of different thresholds on different product categories. 	<p>For the TS:</p> <ul style="list-style-type: none"> — Include producers undergoing conversion, provided they show the relevant supporting documentation (i.e. that they are under the supervision of an accredited certification body). <p>For the AC:</p> <ul style="list-style-type: none"> — No changes proposed. <p>Further actions to be considered beyond the scope of this report:</p> <p>Advise contracting authorities on how to set appropriate thresholds and which products to procure, i.e. through market dialogue.</p> <ul style="list-style-type: none"> — Advise the application of progressive thresholds to facilitate uptake and adaptation to market dynamics over time.

Source: Authors' own elaboration.

TS. 1 Organic Food products

Option A (easier to verify during contract execution)

The following food and drink products [to be inserted by the contracting authority, see also explanatory notes] shall comply with Regulation (EC) No 2018/848. In the case that organic products are not readily available: these can be sourced from producers undergoing organic conversion. Producers in conversion shall submit the relevant documentation confirming that they are controlled by a certification body.* Regulation (EC) No 2018/848, art. 10 provides the regulatory guidance for producers in conversion.

Option B (more complex to verify during contract execution)

TS 1.1 At least X% in mass/volume of the total food and drink products purchased shall comply with Regulation (EC) No 2018/848. In the case that organic products are not readily available, a part of the X% can be sourced from producers undergoing organic conversion. Producers in conversion shall submit the relevant documentation confirming that they are controlled by a certification body.* Regulation (EC) No 2018/848, art. 10 provides the regulatory guidance for producers in conversion.

Thresholds proposed in GPP for core criteria	Thresholds proposed in GPP for comprehensive criteria
<p>Option A Products can include fruit, vegetables, legumes, cereals, rice and pasta, aquaculture products, dairy and meat.</p> <p>Option B 20-60% in mass of the total food and drinks products purchased, or 30-70% in value of the total food and drinks products purchased.</p>	<p>Option A Products can include fruit, vegetables, legumes, cereals, rice and pasta, aquaculture products, dairy and meat.</p> <p>Option B >50% in mass of the total food and drinks products purchased or; >60% in value of the total of food and drinks products purchased.</p>

AC 1. Additional Organic food products

Option A (easier to verify during contract execution) Points are to be proportionally awarded to tenders that exceed the list of food and drinks products [listed in TS22 option A] and comply with the organic products standards.

Option B (more complex to verify during contract execution) Points are to be proportionally awarded to tenders in which more than the required X% of the total purchases of food and drink products have been produced in accordance with Regulation (EC) No 2018/848.

In the case that some organic products are not readily available, products originating from farms which are undergoing conversion to organic production standards can also be counted towards fulfilling the requirements of the technical specifications. Producers in conversion shall submit the relevant documentation confirming that the conversion is controlled by a certification body. Regulation (EC) No 2018/848, art. 10 provides the regulatory guidance for producers in conversion.

***Note:** the purchase of products from operators undergoing conversion should occur mainly in the case of low offer, as it is meant to be an interim solution to encourage the development of the market, allowing to move gradually towards fully certified organic products with time.

Verification

Option A The tenderer must provide a declaration that all food and drink products listed above, that are to be supplied during the execution of the contract, comply with Regulation (EC) No 2018/848 or its subsequent amendments. In addition, the tenderer must provide a description of how it intends to ensure that the products mentioned above can be sourced during contract execution from organic sources (e.g. by identifying suppliers for the different products). Producers in conversion shall submit evidence that they are being supervised by relevant authorities or accredited certification bodies through relevant documentation.

Option B The tenderer must provide data (name and amount) of food and drink products that are to be supplied in the execution of the contract, indicating specifically the products that comply with organic requirements. Producers in conversion shall submit evidence that they are being supervised by relevant authorities or accredited certification bodies through relevant documentation.

Best practices and examples

Austria

The country introduced progressive objectives to 2030 for organic food procurement:

The following minimum proportions of the food purchased must come from organic/organic production in accordance with the currently valid EU legal situation. The minimum shares refer to the monetary value of the food purchased in the calendar year:

- Min. 25% from 2023.
- Min. 30% from 2025.
- Min. 55% from 2030.

(naBe-Plattform.n.d - Technical specification for food and food services³)

Denmark

The Danish Ministry of Food, Agriculture and Fisheries launched a procurement program in 2012 to promote the use of organic food in public sector kitchens. The program's goal was to have 60% of food products purchased by these kitchens be organic by 2020. The program used a combination of economic subsidies, informative tools, and regulatory measures to encourage public sector kitchens to use more organic food products. The government granted funds to support the conversion of kitchens to use more organic food products, and the Danish Veterinary and Food Administration played a key role in designing and implementing the program. The program relied on collaboration between public and private actors to develop and implement it. There was no systematic monitoring of local and regional government achievements in terms of procurement of organic food. However, the program did lead to an increase in the availability of organic food products for public sector kitchens, and food wholesalers reported that they were able to source all necessary organic food products by early 2013⁴⁵.

Holmbeck (2020).

France

The Egalim Law set a goal for 20% organic purchases for all public purchases in the country. Products from farms in the process of organic conversion can be counted to reach the 20% target, which is part of the broader objective of 50% sustainable and quality food procurement. Only fresh products or products made from a single plant-based ingredient qualify, and they must come from farms that have been in organic conversion for over a year, according to the EU's Regulation (EU) 2018/848. The certification body's ID must be included on the product label.

(Republique Française, 2018 - Loi Egalim⁶).

Finland

The national public procurement strategy sets forth a target for 25% of organic products of the total weight of food purchased by 2030. Similarly, the national organic program targets public professional kitchens, requiring that 25% of their raw materials be organic by the same year.

(Ministry of Agriculture and Forestry of Finland, 2023 - Organic 2.0 – Finland's National Programme for Organic Production 2030⁷).

Madrid (Spain)

The city's nurseries use 100% organic products, based on weight or volume, across several key food groups, especially pulses (like chickpeas and lentils), fresh vegetables—such as potatoes, onions, pumpkins, zucchinis, carrots, tomatoes, peppers, and lettuces. Additionally, organic standards are applied to pasta, rice, other cereals and tubers (excluding bread), as well as milk (excluding infant formula) and yogurts.

This initiative is part of Madrid's broader dedication to nutrition, sustainability, and the wellbeing of young children.

(School Food 4 Change (2023) and project website⁸).

3.1.2 Fishery and aquaculture food products

Rationale: Supporting analysis shows how MSs are opting for the implementation of the core criteria with very few examples “translating” the comprehensive criteria into national provisions (García-Herrero et al., 2024). Criteria in MSs hinge on purchasing Fish and Aquaculture products certified through the major commercial certification schemes. This could limit the impact of introducing these criteria (since commercial certification schemes could be limited in their scope compared with what is recommended in the comprehensive criteria), as well as limit access to market for SMEs. More insights on the verification mechanisms beyond commercial certification schemes are necessary.

In addition, formatting and presentation of the Marine and aquaculture criterion in EU GPP can be improved to ensure that more comprehensive criteria are increasingly understood and applied. The comprehensive criteria in the EU GPP provide useful supporting information, but often references to resources such as the Scientific, Technical and Economic Committee for Fisheries (STECF) or other highly specific organisation are not accompanied with guidance on how to use this information. As procurement is often done by legal professionals, highly technical language can make it difficult for contracting authorities to apply these criteria effectively in their procurement processes.

This gap may lead to an overemphasis on certifications that may not fully account for critical sustainability aspects such as seasonality of fish stocks, seabed impacts from fishing methods, and the traceability of feed used in aquaculture, which are currently not addressed by EU GPP criteria but have significant environmental implications. Depletion of fish stocks is relevant because it jeopardises the balance of marine ecosystems and the food of people who rely on fish as a primary protein source. Moreover, it affects the economic stability of fishing communities and can lead to the loss of biodiversity, with consequences for the environmental health of our oceans. Animal welfare aspects for fisheries and aquaculture are also recognised as a gap (Ciliberti et al., 2024), but operationalisation of criteria beyond the current standard of EU animal welfare regulation is unclear.

Proposed actions include restructuring the criterion text for clarity and ensuring up-to-date sources are provided, thereby ensuring the criterion's wider applicability. Finally, further investigation into the social and working conditions within the fishery and aquaculture industry is necessary, as current commercial certifications may not adequately cover these critical issues.

Objective: Ensure greater uptake of comprehensive criteria for Fishery and aquaculture food products while enlarging the coverage of the criteria.

³ https://www.nabe.gv.at/wp-content/uploads/2021/06/6_Lebensmittel-und-Verpflegungsdienstleistungen_naBe-Kriterien-1.pdf

⁴ <https://data.europa.eu/doi/10.2777/1214?dd#:~:text=Organic%20public%20procurement%20has%20increased>

⁵ https://www.organicseurope.bio/content/uploads/2021/06/IFOAMOE_Best-Practice-in-Organic-Public-Procurement_The-case-of-Denmark.pdf

⁶ <https://www.legifrance.gouv.fr/loda/id/JORFTEXT000037547946/>

⁷ https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/164748/MMM_2023_9.pdf?sequence=1&isAllowed=y

⁸ <https://schoolfood4change.eu/blog/2023/11/15/insights-from-the-replication-city-madrid/>

Table 4. Gaps and proposed actions in fisheries and aquaculture products.

Gaps identified from the technical analysis	Proposed action
<ul style="list-style-type: none"> — The current EU GPP criteria provide links to the STECF -JRC and other scientific works, but in some cases the provided links are broken making it difficult to find the right source. — For the comprehensive criteria, it should be understood to what extent they could be implemented easily by contracting authorities. The phrasing is highly technical, possibly hindering application in tenders. — Widely available commercial certifications become the default instead of applying comprehensive criteria. — Wild fish stocks and availability of fish on the market are also linked to seasonality, temporary closures of fishing activities to ensure stock regeneration, resource availability. This is usually not accounted for in public procurement narratives, which focus on the seasonality of fruits and vegetables. — Seabed impacts are not accounted for in current EU GPP. Fish products should originate from fishing techniques that achieve a minimum sustainability score regarding impact on the seabed. — Traceability in aquaculture should guarantee that records of feed used are kept and retrievable from contracting authorities as aquaculture feed can be a driver of biotic resource depletion through extensive use of wild caught fish, and deforestation/biodiversity loss through soy and animal products. These are hotspots currently not accounted for by the EU GPP criterion. — The fishery and aquaculture industries are also a hotspot for social/working conditions. The extent to which existing certifications also cover this hotspot needs to be further investigated (see also chapter 3.2.2). 	<p>For the TS:</p> <ul style="list-style-type: none"> — Restructure the text of the criterion and recheck the sources provided to make sure they are up to date; provide a clearer formulation of the comprehensive criteria, if possible. — Possibly propose a traceability criterion to ensure information on origin of fishery and aquaculture products is shared, as well as information on the origin of feed used for aquaculture. — Addition of animal welfare insights. — Encourage contracting authorities to choose fishery and aquaculture products that have lower environmental impacts and come from non-overfished stocks (Gephart et al., 2021). <p>For the AC:</p> <ul style="list-style-type: none"> — No changes proposed. <p>Further actions to be considered beyond the scope of this report:</p> <ul style="list-style-type: none"> — Carry out further research on the working conditions/labour aspects considered by Marine Stewardship Council (MSC)/ Aquaculture Stewardship Council (ASC). — Explore the possibility of drafting an award criterion for ethical work conditions in the fishery and aquaculture industry. — Issue guidance for contracting authorities on sustainable fish species, including a list of neglected species (commercially less exploited and low -trophic fish species) which can be favoured (to provide a positive counterpart to the list of “fish to avoid”). — Further investigate possible synergies /trade-offs with the Healthy and sustainable meals criteria.

Source: Authors' own elaboration.

TS 2. Marine and aquaculture food products

Core

TS 2.1 No fish or fish products are to be used from species and stocks identified in a 'fish to avoid' list which reflects the state of fish stocks in different regions.

Aquaculture products shall ensure animal welfare standards, such as described in both Council Directive 98/58/EC concerning the protection of animals kept for farming purposes and Council Regulation (EC) N. 1099/2009 (establishing general standards for the protection of animals of all species kept producing food, wool, skin, fur, or other agricultural purposes, including fish, reptiles, and amphibians).

Comprehensive

TS 2.2

Option A The following fishery and aquaculture products

[list of fishery and aquaculture products to be defined by the contracting authority]

shall have been produced from stocks within safe biological limits addressing environmental impacts, including over-fishing or depletion, biodiversity and responsible and sustainable use of the resources.

Contracting authorities could draft specific lists of "fish to avoid" for their specific situation, to facilitate the execution of contracts. The lists shall also take into consideration seasonality of wild fish stocks.

Similarly, contracting authorities can provide lists of underutilised marine and aquaculture species whose stocks are healthy but are currently not subject to overfishing due to consumer preferences or market dynamics. Products from low-trophic fisheries and aquaculture, including mussels, clams, small fish (herring, sardines, anchovies) can be considered due to their lower environmental impact.

Option B

TS 2.3. At least Y% of the purchases of fishery and aquaculture must have been produced from stocks within safe biological limits addressing environmental impacts, including over-fishing or depletion, biodiversity and responsible and sustainable use of the resources.

Verification

The tenderer must provide a declaration that only fish and fish products that are compliant with the requirement mentioned above will be supplied. In addition, the tenderer must provide a description of how it intends to ensure compliance during the execution of the contract. (e.g. by identifying suppliers for the different products).

This criterion provides a prioritisation of methods to help verify the criteria:

1. Evidence substantiating the sustainability of the targeted fish stock. Stock assessments by the International Council for the Exploration of the Sea (ICES) and similar stock assessment bodies can be used for that purpose.
2. Lists of fish to avoid which needs to draw up by contracting authorities. (See for example those proposed by the WWF in the WWF Fish and Seafood Guides⁹).
3. Commercially available certifications (MSC, ASC, Friend of the Sea or others).

⁹ https://wwf.panda.org/act/live_green/out_shopping/seafood_guides/

Best practices and examples

Ghent (Belgium)

The city of Ghent (as highlighted in the School Food 4 Change project (2023) examples) promotes the purchase of “good fish” which meets the following definition:

- Comes from a well-managed stock;
- Caught/farmed with minimal environmental damage;
- Traceability to the origin;
- Not caught neither traded illegally;
- Produced/caught under good/honest labour/working conditions.

Fish calendar: The City of Ghent considers the seasonal aspects of fish, crustaceans and shellfish into account as much as possible when ordering, based on the fish calendar. In this way, products are seasonal and thus purchased at the right time. Here too it is the supplier's task to point this out to the buyer and, based on the fish calendar, to propose a sustainable alternative if it appears that this has not been considered.

Exclusion of specific fish species: The City of Ghent decided to stop buying a number of fish species for their food catering services. The following fish species are not allowed: Tuna, pangasius, Victoria perch (Nile perch), tilapia or eel.

Sweden

The Swedish SPP criteria provide seven different criteria which contracting authorities can incorporate in their tenders covering different aspects.

The core criteria cover:

- Wild fish and shellfish (sustainable according to MSC or KRAV);
- Fish and shellfish from aquaculture, including traceability, health and environmental assessment requirements;
- Organic aquaculture products;
- Fish list.

The advanced criteria cover:

- Information requirements for prepared fish products;
- Environmental and climate impact from fishing vessels and production facilities.

More information can be found on the website of the Swedish procurement agency¹⁰

Finland

In Finland, initiatives to boost the use of local fish species have been set in motion through various funding sources. These projects aim to enhance the utilisation of local fish, particularly underutilised species, in professional kitchens and the ready-made food industry, thereby promoting biodiversity. As part of this effort, Hansel, the central public procurement unit, has included local fish options in their tenders alongside conventional products, allowing purchasers the flexibility to choose according to their procurement strategies.

Significantly, Norwegian salmon has been replaced with rainbow trout in these tenders. Fish certifications are required where applicable, with MSC certification mandatory for wild-caught fish from the sea or lakes, and ASC certification for aquaculture fish products. WWF's fish traffic light system is also used, permitting green and, in certain cases, yellow-rated species.

The tender includes raw material requirements for nearby marine and inland water fish species (lake fish) and rainbow trout, with specific fishing areas identified for each product to aid in species identification. Throughout the contract period, efforts have been made to increase awareness of available lake fish, herring, and rainbow trout products, with the aim of systematically reducing the use of salmon and rainbow trout.

(More information can be found on the website of the Finnish Procurement Agency¹¹)

3.1.3 Animal welfare

Rationale: The implementation of animal welfare criteria in food catering procurement is becoming increasingly vital to foster ethical practices within the food industry. MSs have taken proactive steps by applying a larger scope than the existing EU GPP provisions, tailoring specific criteria for different animals and livestock systems. This approach recognises the distinct needs and welfare concerns associated with each species and production method, leading to more targeted and effective welfare standards, and is reflected in the listed criteria below.

To assist contracting authorities in adhering to these welfare criteria, some MSs have compiled lists of recognised animal welfare labels. These labels are deemed to meet or exceed the procurement criteria, thereby simplifying the selection process for authorities and ensuring compliance with established welfare standards. However, stakeholders highlight that the absence of a comprehensive EU-level label for animal welfare creates a gap in uniformity and recognition, which would be allowed by a harmonised approach. The animal welfare regulatory landscape in Europe is also quite fragmented, further hindering efforts to implement consistent and effective animal welfare practices across the continent (Eurogroup for the Animals, 2025). Overuse and misuse of antibiotics in livestock contribute to the growing problem of antimicrobial resistance, which is a global health concern. By setting procurement criteria that discourage such practices, the food industry can be steered towards more sustainable and responsible use of antibiotics.

The transport of live animals is another critical phase in the animal welfare continuum, and a Commission proposal for a Regulation on the protection of animals during transport was adopted in December 2023. Synergies with public procurement provisions could thus be maximised. Animal welfare criteria can be applied to promote practices that go beyond the EU or national legislation in safeguarding animal welfare. It should be noted that some animal welfare provisions are also included under the organic TS/AC according to Reg. 2018/848.

Objective: Increase the demand of products guaranteeing animal welfare for a more sustainable food system.

¹⁰ <https://www.upphandlingsmyndigheten.se/en/criteria/food/fish-and-shellfish/>

¹¹ <https://www.hansel.fi/>

Table 5. Gaps and proposed actions for animal welfare.

Gaps identified from the technical analysis	Proposed action
<ul style="list-style-type: none"> — Selected MSs provide very specific animal welfare criteria, with different provisions per animal and livestock system. — MSs often provide lists of animal welfare labels which can be considered as equivalent in their requirements to the procurement criteria, thus facilitating contracting authorities. — There is no comprehensive label for animal welfare at EU level yet. — Antibiotic (mis)use is a hotspot in the food system. The technical analysis shows that some MSs are trying to restrict antibiotic use in animal rearing for specific species and compounds. — Animal welfare issues for marine and aquaculture products are also a sustainability hotspot but not currently taken into consideration in public procurement. — A Commission proposal for a Regulation on the protection of animals during transport was adopted in December 2023, targeting some animal welfare criteria during the transport phase. — Animal welfare SPP criteria can be drafted according to each MSs specific conditions and should go beyond what is the status quo of animal welfare legislation in the country. 	<p>For the TS:</p> <ul style="list-style-type: none"> — Propose TS animal welfare for specific animals and with a wider scope of animal rearing phases (including housing, and slaughter/killing). — Animals for which criteria can be proposed are: <ul style="list-style-type: none"> ○ Poultry; ○ Pigs; ○ Calves; ○ Some fishery and aquaculture products. <p>For the AC:</p> <ul style="list-style-type: none"> — No changes proposed. <p>Further actions to be considered beyond the scope of this report:</p> <ul style="list-style-type: none"> — Investigate possible synergies with Healthy and Sustainable Meals criteria. — Analyse and assess systematically requirements of labelling schemes.

Source: Authors' own elaboration.

TS 3. Eggs

None of the eggs in shell coming from conventional farming are labelled code 3 of Regulation (EC) No 2023/2465 or its subsequent amendments.

Verification

The tenderer must provide a declaration that none of the eggs in shell coming from conventional farming will be labelled code 3 in Annex I to Regulation (EC) No 2023/2465. In addition, the tenderer must provide a description of how it intends to ensure compliance during the execution of the contract (e.g. by identifying suppliers and indicating specifically the ones that will supply eggs compliant respectively with code 1 or 2 of Annex I to Regulation (EC) No 2023/2465).

AC 2. Eggs, meat, and dairy animal welfare

AC 2.1. Points are to be proportionally awarded to tenders in which more than X%1) of the eggs in shell (excluding organic eggs) are labelled code 1 in Annex I Regulation (EC) No 2023/2465.

[Proposed from EU GPP: X=80% of the eggs in shells (excluding organic eggs products) are labelled with code 1].

AC 2.2. Points are to be proportionally awarded to tenders in which more than Y%1) of the total purchases of meat and dairy (excluding those that are organic) have been produced in accordance with the requirements of a certification scheme for animal welfare recognised by a MS. This is a scheme that is based on multi-stakeholder organisations with a broad membership and addresses general aspects, housing, density, minimum use of antibiotics, slaughter, maximum transportation time, and addresses aspects such as grazing and access to pasture for dairy cows

[Y=0-25% of meat and dairy products].

Verification

AC 2.1. See above TS 3.

AC 2.2. The tenderer must provide data (name and amount) of the meat products that are to be supplied in the execution of the contract indicating specifically the ones that comply with the requirements.

TS 4. Poultry (broilers)

Raw chicken and processed products containing chicken shall come from supply chains that follow these requirements:

- Use slow growing breed i.e.: with a daily average gain < 50 g/day;
- breed listed in the EU Better Chicken Commitment.
- Adopt controlled atmospheric stunning using inert gas or multi-phase systems.
- Do not use cages.
- Does not apply the derogations of the Council Directive 2007/43/EC on stocking density: the density shall not exceed 33kg/m² at any time.

Verification

Adherence to the EU Better Chicken Commitment and its requirements, or can provide evidence of complying with the criteria requirements through third party audit.

Chicken breeds that match the criteria include Hubbard Redbro (indoor only), Hubbard Norfolk Black, JA757, JACY57, 787, 957 or 987, Rambler Ranger and Ranger Gold, or other breeds that meet the criteria of the EU chicken commitment.

The Better Chicken Commitment - BCC EU¹²

¹² <https://betterchickencommitment.com/eu/>

TS 5. Pigs

Pork and products containing pork shall come from pigs whose tail has not been docked¹³. Favour no surgically castrated pigs. Otherwise, anaesthesia and analgesia should be used for castration.

Verification

Third party audit of the slaughterhouse where the pork is sourced from.
Certification for cage free, either national schemes or international schemes.

TS 6. Calves

Veal products come from calves that have been kept in contact with the dam for a minimum of 24 hours post-partum (EFSA Panel on Animal Health and Animal Welfare (AHAW) 2023)

Verification

To be identified by the contracting authority.

TS 7. All animals

Transport time between the primary producer and the slaughterhouse shall be 8 hours maximum. This applies to all animals and states.

Verification

Supplier self-declaration of distance between the producer and the slaughterhouse, audit of drivers' logs

XX. XX All animals

Animal products come from animals reared in a cage-free farm (in the case of pigs, farms without sow stalls and farrowing crates).

Third party audit of the slaughterhouse where the pork is sourced from or certifications of "cage-free" farming. Member States' labelling schemes can be used to verify this criterion.

Best practices and examples

Selected MSs (AT/FI/SE) propose an expanded understanding of SPP criteria for animal welfare, including specific requirements per animal and phase of rearing (See García-Herrero et al., 2024).

Finland

The Finnish regulatory environment on animal welfare facilitates the purchase of higher animal welfare products through a system of verification of health, hygiene and welfare

Animal welfare is closely monitored through national certification systems (NASEVA¹⁴ for cattle; SIKAVA¹⁵ for pigs). Notably, 100% of dairy farms and 97% of beef production farms participate in NASEVA.

Beef/dairy: The NASEVA health monitoring system for cattle farms, initiated in 2006, together with the ISO 9001 certification obtained by ETT in 2007, ensures operations comply with quality manuals that enhance animal health, welfare, and food safety. This system emphasises monitoring and improving animal welfare, including an annual veterinary health review. Over 65% of cattle reside in free-movement housing, and over 70% graze during summer. The beef consumed in public procurement settings usually comes from dairy cows.

¹³ Tail docking is considered a "iceberg" indicator for pig animal welfare, in the EU "routine tail docking" is banned, but there is no assurance and definition of what 'routine' means.

¹⁴ <https://www.naseva.fi/>

¹⁵ <https://www.sikava.fi/>

Pork: In pork production, the SIKAVA Index takes into account all aspects of the Welfare Quality® protocol, including good health, favorable conditions, proper feeding, and appropriate behavior. The development of these quality standards led to the introduction of the Laatuvastuu (Quality Responsibility) label in 2013, and its certification according to the ISO 9001 standard in 2014. The Laatuvastuu system, in line with Commission Delegated Regulation (EU) 2022/126, is the only quality system approved by an EU member state. Due to high hygiene standards, the use of antibiotics in feed is not necessary in Finnish pork production. SIKAVA is regarded as a fundamental minimum requirement to ensure high welfare standards in Finland.

(More information can be retrieved at the website of the Finnish procurement agency¹⁶).

List of labels that could be used to inspire best practices:

Reviews of animal welfare provisions included in existing labels are available at:

European Commission (2022);

Annex 4 in Sanyé Mengual et al. (2024b).

3.1.4 Fair and ethical trade products

Rationale: GPP criteria included provisions of ethical and sustainable sourcing through the AC on fair and ethical trade products. It should be noted that, due to legal constraints, it is not possible to introduce a TS, as outlined by case law (European Court of Justice, 2022).

While no formal changes are suggested to the formulation of existing criteria (which is thus reported in its current formulation below, with no further edits), there is an acknowledgment of the need for further research into the market availability and affordability of specific fair-traded products across MS. It is essential to ensure that the procurement of such products is not only aspirational but achievable. Ad-hoc market analysis could therefore provide necessary insights into the potential economic impact of these procurement practices, enabling the development of strategies that could stimulate the growth of fair-trade supply chains.

Performance clauses and reserved contracts for fair trade products can be used to increase the demand for fair trade products. Public authorities could also set ambitious targets to increase the demand for such products.

Objective: Increase the uptake of fair-trade criteria through highlighting the relevance of this topic under the SPP umbrella.

¹⁶ <https://www.hansel.fi/en/>

Table 6. Gaps and proposed actions in fair and ethical trade products.

Gaps identified from the technical analysis	Proposed action
<p>— There are legal limitations to the introduction of TS on fair and ethical trade products.</p>	<p>Further actions to be considered beyond the scope of this report:</p> <ul style="list-style-type: none"> — Further research is needed on the market of specific fair-traded products to quantify supply and feasibility of application of such criteria across MSs and products. — Evidence of case studies succeeding in procuring fair trade products. — A criterion targeting ethical production in Europe is also proposed but separately (chapter 3.2.2), as this criterion is targeting mostly products such as cocoa, coffee.

Source: Authors' own elaboration.

AC 25. Fair and ethical trade products
<p>Option A (<i>easier to verify during contract execution</i>)</p> <p>The following food and drink products [to be inserted by the contracting authority] shall have been produced and traded in accordance with the requirements of a fair and ethical trade certification scheme that requires a minimum certified content of 90%. This is a scheme that is based on multi-stakeholder organisations with a broad membership. The scheme addresses international fair trade standards including working conditions for production in accordance with the core conventions of International Labour Organisation (ILO).</p> <p>Products included:</p> <p>coffee, tea, chocolate (cocoa), sugar, bananas, other fruits and packaged fruits, exotic fruit juice, avocados, tomatoes, spices, fishery and aquaculture products etc.</p>
<p>Verification</p> <p>The tenderer must provide data (name and amount) of all products to be supplied in the execution of the contract indicating the ones compliant with the criterion.</p>
<p>Option B (<i>more complex to verify during contract execution</i>)</p> <p>Points are to be awarded proportionally to tenders in which more than X% of the total purchases of each of the following products [<i>list of food and drink products</i>] have been produced and traded in accordance with the requirements of a fair and ethical trade certification scheme that requires a minimum certified content of 90%. This is a scheme that is based on multi-stakeholder organisations with a broad membership. The scheme addresses international fair and ethical trade standards including working conditions for production in accordance with the core conventions of International Labour Organisation (ILO).</p> <p>Products included:</p> <p>Coffee, tea, chocolate (cocoa), sugar, bananas, other fruits and packaged fruits, exotic fruit juice, avocados, tomatoes, spices, etc.</p>
<p>Verification</p> <p>The tenderer must provide the list of products to be supplied in the execution of the contract that comply with the criterion.</p>

Best practices and examples

Austria

Austria has introduced specifications for the purchase of 100% coffee and black tea purchased from fair and ethical trade. ([naBe-Plattform,n.d - Technical specification for food and food services^{17\)}](#))

Oslo (Norway)

The City of Oslo had the objectives of increasing by 2022 the share of fair-trade-bananas to 70%, fair trade-coffee to 30% and fair trade tea to 10%. (European Commission, 2020; Interview with civil servant of the city of Oslo, from Lermant et al. 2024).

France

The French Fair Trade organisation piloted partnerships with several local authorities (Nice, Clermont-Ferrand, and Lyon), to implement the "fair remuneration for agricultural producers" in public procurement. These pilot projects aim to explore the legal and operational feasibility of incorporating fair remuneration criteria into public purchasing, in compliance with national and European procurement regulations. Known as the "Fair Remuneration Territories" program, this initiative serves as a contractual innovation lab, where the municipalities collaborate with local procurement departments and school catering operators. The objective is to develop procurement processes that extend beyond mere price criteria, thereby recognizing and rewarding fair compensation for producers in local, national, or international agri-food supply chains.

(Commerce Équitable¹⁸; Collectivités territoriales et commerce équitable¹⁹⁾)

Others

A list of best practices is also compiled in Fair Trade Advocacy (2025)²⁰⁾

3.1.5 More environmentally friendly vegetable fats

Rationale: The recent technical analysis on the provision of more environmentally friendly vegetable fats in food procurement has revealed slightly varying approaches among the MSs in the transposition of this EU GPP criterion. Some MSs have taken a stringent approach by proposing outright bans on the use of palm oil due to its association with deforestation and other environmental concerns. Meanwhile, some Mediterranean countries have stipulated the exclusive use of olive oil as an added fat in food preparation, which can be seen as aligning with traditional dietary practices and with environmental considerations, particularly when sourced from sustainable olive groves. These approaches are interlinked with specific MSs policies and contexts and are thus not recommended as such in the current work.

Additionally, the traceability of palm oil and soy products used in animal feed is identified as a critical factor for addressing environmental hotspots, as it enables the monitoring of the supply chain to prevent the use of products linked to deforestation and habitat destruction. In addition to these recent developments, there is no substantial additional evidence of the need and feasibility of introducing further requirements related specifically to vegetable oils and fats, for example related to use of certified feed in the meat procured through public contracts. Banning the use is also not seen as feasible or necessary. While no formal changes are suggested to the formulation of existing criteria, further details on verification are provided. This criterion can also function in synergy with TS 14 on the use of saturated fats (chapter 6.2).

¹⁷ https://www.nabe.gv.at/wp-content/uploads/2021/06/6_Lebensmittel-und-Verpflegungsdienstleistungen_naBe-Kriterien-1.pdf

¹⁸ https://www.commerceequitable.org/wp-content/uploads/ce_cantine_vf_bd.pdf

¹⁹ <https://www.fairtrade.net/maxhavelaarfrance-fr/agir-avec-nous/s-engager/collectivites.html>

²⁰ <https://fairtrade-advocacy.org/storage/documents/3mnKr1kzSn3TllIPtkT3VmAXnQlCdrRYfI5rc9h.pdf>

Objective: Prioritise the use of environmentally friendly fats by ensuring the criteria are substantiated by updated information benefiting from recent developments.

Table 7. Gaps and proposed actions in environmentally friendly vegetable fats.

Gaps identified from the technical analysis	Proposed action
<ul style="list-style-type: none"> — Some MSs propose outright bans on the use of palm oil in food procurement. — Mediterranean countries (PT, IT) include requirements to use only olive oil as added fat in preparation (see Nutritional criteria for possible synergies). — Traceability of palm oil/soy products in animal feed is necessary to ensure coverage of environmental hotspots. — SE/FI provide different levels of ambition for criteria based on the type of certification used (see best practices and examples below). 	<p>For the TS:</p> <ul style="list-style-type: none"> — Possibly expand the scope/wording of current criterion to refer to soy products produced with soy affected by deforestation. — Possibly follow the approach of SE/FI and include the differentiation of the supply chain models which can be used under the most commercially available certifications like RSPO. <p>Further actions to be considered beyond the scope of this report:</p> <ul style="list-style-type: none"> — Review overlaps with deforestation regulation 2023/115 which came into effect in 2024 - <i>“The EUDR also includes a procurement-specific provision establishing the temporary exclusion from public procurement processes as a minimum penalty for breaching its provisions”</i> (Falvo & Muscaritoli, 2024).

Source: Authors' own elaboration.

TS 9. More environmentally friendly vegetable fats

TS 9.1. If pre-packed food and/or drink products containing vegetable fats are purchased, at least X% of the units/items of pre-packed food products containing vegetable oils/fats must have been produced from crops complying with environmental criteria regarding soil, biodiversity, land-use change and organic carbon stocks by meeting the requirements of a certification scheme covering these issues, of Article 93 of Regulation (EU) No 1306/2013, or by other equivalent means.

TS 9.2. If vegetable oil is purchased, at least Y% of the vegetable oil/fats purchased as raw ingredients must have been produced from crops complying with environmental criteria regarding soil, biodiversity, land-use change and organic carbon stocks by meeting the requirements of a certification scheme covering these issues, of Article 93 of Regulation (EU) No 1306/2013, or by other equivalent means.

Verification

TS 9.1. The tenderer must provide a declaration that at least X% of all the food products containing vegetable fats (as units) to be supplied in the execution of the contract are compliant with the requirement mentioned above. The tenderer must include a description of the measures that will be taken to ensure compliance (e.g. sources of supply that could be used).

TS 9.2. The tenderer must provide a declaration that at least Y% of all vegetable oil or their derivatives (as raw ingredient or as margarines) that it supplies are compliant with the requirement mentioned above. The tenderer must include a description of the measures that will be taken to ensure compliance (e.g. sources of supply that could be used).

Schemes based on organisations with a broad multi-stakeholder membership, including NGOs, industry and government can show compliance with the criterion provided they cover the environmental principles mentioned.

- Roundtable on Sustainable Palm Oil - RSPO²¹,
- Palm Oil Innovation Group - POIG²²,
- Roundtable on Responsible Soy - RTRS²³,
- The Soybean Sustainability Assurance Protocol - SSAP²⁴ or
- Pro-Terra²⁵
- DonauSoja²⁶

Other schemes, including at country level, are to be considered as equivalent if they comply with the environmental principles mentioned.

AC 3. All vegetable fats from sustainable sources

100% of vegetable oils and fats purchased come from crops complying with environmental criteria regarding soil, biodiversity, land-use change and organic carbon stocks by meeting the requirements of a certification scheme covering these issues, of Article 93 of Regulation (EU) No 1306/2013, or by other equivalent means.

Verification

AC 3. The tenderer must provide a declaration that 100% of all purchased vegetable oils and fats (as units) are supplied in the execution of the contract are compliant with the requirement mentioned above. The tenderer must include a description of the measures that will be taken to ensure compliance (e.g. sources of supply that could be used).

²¹ <https://rspo.org/>

²² <https://poig.org/>

²³ <https://responsiblesoy.org/?lang=en>

Best practices and examples

From RSPO: palm oil and its derivatives can be sourced through different supply chains:

- Identity preserved: from a single identifiable certified source that is kept separately from ordinary palm oil throughout the supply chain.
- Segregated: from different certified sources that is kept separate from ordinary palm oil throughout the supply chain.
- Mass Balance: from certified sources that is mixed with ordinary palm oil throughout the supply chain.
- Credits/Book & Claim: Manufacturers and retailers can buy RSPO Credits and RSPO Independent Smallholder Credits from RSPO Certified growers, crushers and independent smallholders. By purchasing RSPO Credits, buyers encourage the production of Certified Sustainable Palm Oil. To continue providing economic incentives to growers, we need the flexibility of the Mass Balance supply chain to provide growers increased access to international markets.

MSs like Sweden and Finland provide guidance in regard to what supply chain model to use based on the procurers' ambition. Identity preserved and segregated supply chains usually are more ambitious in their environmental objectives.

3.2 New criteria put forward

The sustainable public procurement criteria for Food listed in the following chapter have been drafted following the outcomes of the technical analysis of provisions at Member States level. The EU GPP criteria are already quite comprehensive in addressing environmental hotspots of the food system. For this, the elements of novelty presented in this report mostly address social hotspots, particularly nutrition (see chapter 6). These new criteria are provided in the form of both TS and AC.

Additional environmental criteria are also formulated and included in this draft to complement what existing in the EU GPP. These refer to sustainable agricultural management practices, working condition, and short food supply chains. Considering evidence on the low and heterogeneous uptake of voluntary EU GPP criteria, it should be noted that these new environmental criteria are mainly introduced as AC since introducing these aspects as TS could pose an unnecessary burden on stakeholders. However, providing the possibility of including AC in tenders could reward primary producers and supply chain actors who are implementing more sustainable practices.

3.2.1 Primary production – Sustainable agricultural management practices

Rationale: Sustainable agricultural practices are at the core of the EU Green Deal. The key identified main areas of concern, or hotspots, are on energy use in agriculture, water use, fertilisers, pesticides, agricultural practices, carbon sequestration and storage in forests and soils, greenhouse gas emissions from soils, monitoring. For these, we suggest some criteria listed below. Sustainable production is key for environmental sustainability and to guarantee the resilience of agricultural systems.

However, technical analysis has identified that while organic farming is a widely recognised practice, there are many other agricultural practices that can contribute to sustainability which are not sufficiently incorporated into current criteria. To bridge this gap, award criteria should be designed to recognise and incentivise specific actions related to input management, such as the use of fertilisers, plant protection products, energy sources, water conservation, and sustainable agricultural practices. A challenge in promoting integrated pest management is the lack of a

²⁴ <https://ussec.org/>

²⁵ <https://www.proterrafoundation.org/>

²⁶ <https://www.donausoja.org/certification-inspection/recognition/>

common definition and verification procedures at the EU level, which has previously prevented its inclusion in the list of criteria.

To overcome these challenges, it is **important to assess existing certification schemes** that can provide a framework for verification. A recent overview of farm certification schemes, conducted for the European Parliament's Agri Committee, could provide a useful basis to establish which schemes are available in the EU (Chever et al., 2022). A thorough analysis to establish which requirements can be considered needs to be conducted. These certifications can serve as a foundation for designing award criteria that are both practical and verifiable.

By rewarding a range of sustainable agricultural management practices, the sustainability of the food system can be enhanced. The award criteria should also consider the variability in agricultural conditions across regions, recognizing that organic agriculture may not be sufficiently productive or developed in certain areas. The criteria should be flexible enough to accommodate different environmental and agricultural contexts, possibly restricting application to specific products where relevant. This approach ensures that the award criteria are tailored to promote the protection and restoration of natural ecosystems, sustainable land and water management, and monitoring of environmental impact indicators, ultimately leading to a more sustainable food system. These criteria can be applied synergistically with the organic criteria to further stimulate the demand for products coming from sustainable farming practices, such as agroecological farming or sustainable farming systems.

It should be noted that the **procurement of organic products remains a priority**, hence the inclusion, in this case, of both TS and AC. The inclusion of some additional ACs for sustainable agricultural management practices aims to facilitate the access to public contracts to those producers who implement sustainable farming management.

Objective: Foster the demand of products deriving from sustainable farming practices by providing AC for agricultural management practices which can be beneficial for the environment, especially for specific supply chains.

Table 8. Gaps and proposed actions in primary production.

Gaps identified from the technical analysis	Proposed action
<ul style="list-style-type: none"> — There are many agricultural practices which can contribute to sustainable primary production in addition to organic farming. — The EU GPP criteria addressed integrated pest management through an explanatory note, but it was finally not included in the list of criteria due to lack of common definition and verification procedures at EU level. — Organic agriculture might not be possible (or efficient) in certain regions; rewarding sustainable agricultural management could increase the sustainability of the food system. — On input management, energy efficiency or biodiversity conservation, diverse agricultural practices could be rewarded through award criteria. 	<p>For the AC:</p> <ul style="list-style-type: none"> — Design award criteria for specific actions related to input management (fertilisers, plant protection products, energy sources and use, water use) and sustainable agricultural practices, including enhanced carbon sequestration and storage in soils. <p>Further actions to be considered beyond the scope of this report:</p> <ul style="list-style-type: none"> — Explore the possibility to restrict the application of such criteria to specific products. — Assess certification schemes on agricultural management practices as their requirements can be used to facilitate verification. — Explore further transparency and traceability in food supply chains, as they are key elements to verify the ACs proposed.

Source: Authors' own elaboration.

AC 4. Energy use in agriculture

Option A

If fruits and vegetables grown in greenhouse horticulture systems are provided, additional marks can be awarded to tenderers demonstrating that these products are grown in greenhouses that are either unheated or, if heated, use energy that is 100% derived from renewable sources. Energy optimisation techniques are employed in the heating, cooling, and dehumidification systems.

Option B

If fruits and vegetables coming from greenhouse horticulture are provided, the energy used in greenhouses is of renewable origin, for example, from solar PV panels located on the structure and its surroundings, or it is purchased from renewable energy sources.

Verification

Supplier's self-declaration, verification of the origin of electricity by means for example of a certificate of origin.

AC 5. Water use

Additional marks can be awarded to suppliers who are able to provide documentation of a sustainable use of water in agriculture.

Sustainable water use should ensure that both the consumption and safe use of water for irrigation are guaranteed and closely monitored. Water usage practices are designed to protect local water resources, carefully balancing water withdrawal and discharge from food production activities. Emphasis is placed on employing low water-use techniques and utilizing reclaimed water for food production wherever possible.

Verification

Supplier's description of the water resources used, and the treatment of water discharged from food production. The description includes risk assessments and an action plan to be observed if risks materialise. The description can also be verified by means of quality management or certification systems whose scope includes the use of water. EU/National certification schemes can be used to verify such information.

AC 6. Input management – fertilisers and pesticides

Additional marks can be awarded to suppliers who are able to provide documentation of efforts to decrease the reliance on mineral fertilisers. In the cultivation of crops, fertiliser shall be applied in a way that reduces the risk of nutrient leaching. The amount of fertiliser shall be tailored to the needs of the cultivation and the conditions present.

Additional marks can be awarded to suppliers who are able to provide documentation of efforts to decrease the use of pesticide, employing integrated pest management.

Verification

Verifying documentation could come as an action plan for practices and measures put in place. All applications of pesticides and fertiliser, including watering with fertiliser and/or foliar fertilisation, to the soil or plants, is recorded.

This means that there shall be documentation in the form of a cultivation plan, fertilisation plan, or similar. This includes the product's nutrient requirements along with planned dosage of phosphorus and nitrogen in the form of mineral fertiliser, manure and/or other organic fertiliser.

EU/National certification schemes can be used to verify such information.

AC 7. Agricultural practices

Additional marks can be awarded for products coming from farmers who provide evidence that they will provide food products produced in a way which promotes the protection and restoration of natural ecosystems, sustainable land management and enhanced carbon sequestration and storage in forests and soils, as well as reduced greenhouse gas emissions from soils.

Verification

Supplier's self-declaration, certifications if available, Membership of a Participatory Guarantee System or Evidence (documents, annual report, etc.) that one or more of the following practices is put in place:

- Protection and restoration of natural ecosystems
- Sustainable land and water management
- Crop rotation with leguminous crops
- Reduced erosion and increasing soil organic matter

Verifying documentation could come as an action plan for practices and measures put in place.

Best practices and examples

Rennes (France)

The metropolitan area of Rennes²⁷ set up a collaboration with the Terres de Sources cooperative²⁸ to use public service contracts for the protection of drinking water resources. These contracts are exclusive to farms directly affecting water quality and are guided by strict environmental standards, such as prohibiting neonicotinoids, GMOs, and prophylactic antibiotics. They also require ongoing improvements, measured by targets for reducing inputs and enhancing sustainability scores through an ad-hoc sustainability assessment methodology²⁹.

Contracts are awarded based on environmental quality criteria, which make up at least 50% of the evaluation to reward environmentally responsible producers. Structured through a joint procurement group, the purchasing process is coordinated by a multi-stakeholder governance body, which includes elected officials, associations, companies, and public funders, ensuring thorough oversight and the development of production chains. The cooperative structure (SCIC) manages tender responses, logistics, invoicing, and coordination with catering services, complementing supply contracts. This legally robust model aims to achieve agroecological transition objectives, enhance food sovereignty, and conserve natural resources while ensuring traceability, fair remuneration for producers, and the creation of resilient, sustainable supply chains.

Finland

The central procurement agency of Finland, Hansel, employs various certifications as verification mechanisms. These can include the Sirkka-lehti³⁰ quality label criteria (which is a national scheme targeting vegetables in particular), other commercially available certifications (such as IP Sigill, Global G.A.P, Biodiversity Add-on, Sustainably Grown, SAI Platform, Rainforest Alliance), which can be used to verify specific requirements based on the needs of the tenderer.

Hansel also makes use of a commercially available digital product database which enables public authorities to verify product information provided by suppliers³¹.

Others

- Use measures that promote biodiversity and have been verified by means of audits or third-party certification.
- The tender can also use the relevant EU certification methodologies, implementing the EU Carbon Removals and Carbon Farming Certification (CRCF) Regulation (European Commission, 2024), to evaluate the removals of the GHG emissions indicator described above.
- Support the transition to agroecology, according to the FAO '10 Elements of Agroecology' and the '13 Agroecological Principles' (School Food 4 change, 2023).
- Participatory Guarantee Systems, such as the one employed by a local food community in Tuscany³², can be supported and leveraged in public procurement (IFOAM, n.d.).

AC 8. Monitoring of environmental impacts

[for suppliers with the capacity to conduct monitoring of environmental impact indicators]

Up to [X] marks are awarded to suppliers who have indicators and monitoring systems based on reducing environmental impacts and/or measures to reduce environmental impacts in at least three of the following categories: climate change, water use, acidification, eutrophication, and biodiversity.

Verification

Use of LCA, showing the baseline scenario and how the improvement in the environmental performance when the food selection occurs. The following means, in order of priority can be used:

- Product Environmental Footprint Category Rules (PEFCR), when available
- Product Environmental Footprint (PEF)/Organisation Environmental Footprint (OEF)
- Environmental Product Declaration (EPD)
- LCA-based tools developed at regional/national level
- Other LCA-based tools
- Relevant EU certification methodologies, implementing the EU Carbon Removals and Carbon Farming Certification (CRCF) Regulation. (European Commission, 2024)

Best practices and examples

See chapter 8.1 of this report.

Perez-Neira, D., Simón, X., & Copena, D. (2021). Agroecological public policies to mitigate climate change: public food procurement for school canteens in the municipality of Ames (Galicia, Spain). *Agroecology and Sustainable Food Systems*, 45(10), 1528–1553. <https://doi.org/10.1080/21683565.2021.1932685>

Simón-Rojo M, Couceiro A, del Valle J, Fariña Tojo J. Public Food Procurement as a Driving Force for Building Local and Agroecological Food Systems: Farmers' Skepticism in Vega Baja del Jarama, Madrid (Spain). *Land*. 2020; 9(9):317. <https://doi.org/10.3390/land9090317>

3.2.2 Working conditions and inclusion of vulnerable groups in primary production, transportation, and processing stages

Rationale: Social aspects are already addressed in the EU public procurement framework, namely through the horizontal social clause in the procurement directive and the Buying social (European Commission, 2021b). However, as extensively analysed by Caimi & Sansonetti (2023), these tools might not be sufficient for ensuring a widespread uptake of social provisions by public authorities. Social provisions for agricultural production within the EU are only partially covered by the fair and ethical trade criterion (AC 4 in EU GPP), as this criterion is often connected with products produced out of Europe. Exploitation of workers in the agricultural sector is however widespread in Europe, especially involving migrant and seasonal workers (EPRS, 2021). Agriculture and food sectors workers' rights can be violated in all Europe (Palumbo, 2022). At EU level, there are regulations and legal provisions in place to ensure adequate wages (Adequate minimum Wages Directive, Directive (EU) 2022/2041) and respect of workers' rights, but the agricultural sector is particularly vulnerable.

²⁷ <https://education-jeunesse.metropole.rennes.fr/restauration-scolaire/>

²⁸ <https://terresdesources.fr/>

²⁹ <https://terresdesources.fr/le-diagnostic-idea/>

³⁰ <https://kauppapuutarhaliitto.fi/tietoa-liitosta/menekinedistaminen/sirkkalehti/>

³¹ <https://gs1.fi/en/our-services/synkka-product-information-service>

³² <https://graniantichitoscani.com/it/>

In conducting a literature review for the technical analysis, these issues have been the object of a dedicated literature search, which however unveiled important research and knowledge gaps. This also applies to workers’ conditions in food services, which could be affected by various issues such as gender equality, appropriate income and attractiveness of the work, upskilling and appropriate training or possible unfavourable conditions occurring due to subcontracting (EFFAT, 2024).

Objective: Ensure that food products purchased through public contracts come from supply chains where economic operators comply with the applicable obligations regarding fair wages, the right to organise and collective bargaining on wage-setting, no child labour, no forced labour, a safe and healthy working environment, and non-discrimination. National laws, collective agreements or international social and labour law provisions (ILO conventions) already provide a framework, but by introducing AC in tenders, compliance with these norms can be mainstreamed.

Table 9. Gaps and proposed actions for working conditions along the supply chain.

Gaps identified from the technical analysis	Proposed action
<ul style="list-style-type: none"> — Social issues are currently not the focus of EU GPP except for high-risk supply chains (e.g. for cocoa, coffee). — The technical analysis shows that criteria usually hinge on the application of third-party certifications on fair trade of products originating from countries outside the EU. — Exploitation of workers in food supply chains is an issue also in the EU, especially in supply chains for fresh fruits and vegetables, meat processing and fisheries. — The fishery industry is also a sustainability hotspot for unfavourable social/working conditions. The extent to which existing certifications on marine and aquaculture products also cover this hotspot needs to be further investigated. — The Buying Social guide (European Commission, 2021b) already acknowledges the need of promoting fair employment opportunities and social inclusion. — Social inclusion can also be considered in the development of new criteria, specifically targeting disadvantaged segments of the workforce. 	<p>For the CPC:</p> <ul style="list-style-type: none"> — Draft a CPC to complement the fair and ethical fair-trade products one but targeting due diligence and transparency in EU agricultural production. — Draft recommendations to include products coming from social farming. <p>Further actions to be considered beyond the scope of this report:</p> <ul style="list-style-type: none"> — Carry out further research to establish a robust but flexible verification mechanisms. — Investigate practices related to labour subcontracting. — Carry out further research on practices promoting inclusion of workers with disabilities, which is necessary to establish model practices and guidance.

Source: Authors’ own elaboration.

CPC / AC 1 Working conditions along supply chains

Up to [x] additional marks can be awarded to suppliers implementing traceability/due diligence along the supply chain (specifically primary production, transport, and processing) to ensure that working conditions are compliant with fundamental ILO conventions and existing EU and national legislation.

Social aspects which can be verified include:

- secure employment, working time, adequate wages, social dialogue (referring to the process of negotiation and consultation involving social partners, such as trade unions, employer organisations, and governments, to address work-related issues and policies), freedom of association, existence of works councils, collective bargaining, including the proportion of workers covered by collective agreements, the information, consultation and participation rights of workers, work life balance, and health and safety.
- respect for gender equality, disability inclusion and equal pay for work of equal value, measures against violence and harassment in the workplace, and diversity;

Verification

- Due diligence mechanisms and Corporate Social Responsibility reporting (as in Directive (EU) 2022/2464). Contractors not meeting the size criteria established in the Directive could voluntarily report what is described in chapter 6a, Article 29, section 2b.
- Documents regarding the regular employment of agricultural workers, and/or proof that contracts are stipulated according to collective bargaining agreements, and/or report on the percentage of workers paid with a living wage, above and below.
- Reference documents can include: OECD guidelines for responsible business conduct (OECD, 2018); Standards such as Global Reporting Initiative (GRI) on this matter (GRI, 2022).

Best practices and examples

Italy

The regulation on minimum environmental criteria allows extra points for bidders who commit, in partnership with specialised companies or personnel, to implementing a due diligence plan along supply chains. This plan must verify compliance with human rights and decent working conditions, as defined by international labour conventions or national sectoral agreements, including during the cultivation and harvesting stages.

At the award phase, bidders must submit a detailed project description, including the expert partner involved, a preliminary contract, the mapping of sub-suppliers, and the selected fruit and vegetable references for due diligence. Evaluation is based on the soundness of the project and expertise involved.

(Ministero dell'ambiente e della sicurezza energetica, 2020 - Italian Legislation on SPP³³).

France

According to the Egalim law of 2022, bidders must report on the actions carried out and provide documentation during the execution of the contract about the evidence of the working conditions identified and any improvements achieved. Due diligence may also be demonstrated through the supply of products for which there is reliable proof of compliance with human rights, national agricultural labour laws, and the absence of exploitative practices such as gangmastering³⁴.

Netherlands

The Netherlands procurement agency has issued a guide on due diligence for social issues and provides relevant guidance on implementation and verification on the website of the procurement criteria ³⁵.

Norway

The Norwegian public procurement agency provides useful documentation on the implementation of social clauses (see at DFØ, 2024 - Public Procurement and Human Rights³⁶).

Others

- Buying Social guide (European Commission, 2021b).
- #WeBuySocialEU – Making Socially Responsible Public Procurement Work: 71 Good Practice Cases - Food and catering services. European Commission - Executive Agency for Small and Medium-sized Enterprises. (2020).
- Using risk identification and risk assessment to understand specific supply chains and inquire about the social hotspots related to them; see OECD guide (2018)³⁷
- Leveraging existing strategies on: diversity and inclusion, Environmental Social Governance (ESG).

Other considerations which can be introduced in public procurement to enable the inclusion of social aspects are as follows:

³³ https://www.mase.gov.it/portale/documents/d/guest/allegato_1_cam_ristorazione-pdf

³⁴ https://ma-cantine.agriculture.gouv.fr/static/documents/Guide_Pratique_MP_Gestion_directe.pdf

³⁵ <https://www.mvicriteria.nl/en/webtool/#/19/2/en> ; <https://www.pianoo.nl/nl/themas/maatschappelijk-verantwoord-inkopen/ketenverantwoordelijkheid-internationale-sociale>

³⁶ <https://anskaffelser.no/en/english/public-procurement-and-human-rights>

³⁷ <https://www.responsiblebusiness.org/media/docs/RBAPracticalGuide.pdf>

Reserved contracts for social enterprises

Products coming from social farming
Reserved lots can be established for products coming from projects of social agriculture. Social agriculture can mean the inclusion of disadvantaged people, or those with disabilities or health or social challenges, into agriculture production and diversification of agricultural activities.
Note that social farm typologies vary across MSs and there is no homogenous framework at this stage (EU CAP Network, 2023). Social farm should be defined by contracting authorities based on relevant national or regional frameworks.
Verification Proof of regular employment of disadvantaged people, or those with disabilities, or health or social challenges.

3.2.3 Short food supply chains

Rationale: Supporting farmers through direct purchases could strengthen their bargaining position and ensure higher revenues (Kneafsey et al., 2013), however this might depend on specificities of each supply chain. The Vision for agriculture and food recognises the pivotal role of short food supply chains in ensuring fairer prices for farmers and fishers (European Commission, 2025a). The benefits of short chain sales are also recognised by the European Economic and Social Committee³⁸. Scientific literature on short chains recognises that they can contribute to various dimensions of sustainability, in particular the social dimensions, while it is less conclusive on the causality leading to higher environmental sustainability (Petruzzelli et al., 2023; Kneafsey et al., 2013); nonetheless, there is a high variability of case studies analysed, and sustainability indicators chosen in the analysis. The choice of what products and supply chains should be favoured through this criterion is therefore also highly market/context dependent and should be carefully analysed by contracting authorities. Market analysis and dialogue play an integral role. Further information to support the inclusion of short food supply chain in procurement can be found in Annex 3.

As it can be extrapolated by the technical analysis of existing public procurement provisions in EU MS (e.g. Italy, Spain and Portugal), territorial resilience, rural development and farmer incomes could be fostered through different criteria, such as “local” or “support to family farms”. However, explicitly prioritizing small-holder farmers and “local” producers, depending on its modalities, could pose challenges in the relation to the principles of the procurement directive (primarily non-discrimination and equal treatment) (Andhov et al., 2024).

Objective: Support primary producers by enhancing their market access and strengthening their bargaining position in the food supply chain.

Table 10. Gaps and proposed actions in short supply chains.

Gaps identified from the technical analysis	Proposed action
— Short food supply chains can strengthen territorial resilience, foster connections between consumers and producers, strengthen food security, reinforcing the	For the CPC/AC : — Propose a criterion based on relational proximity rather than geographical proximity, making

³⁸European Economic and Social Committee (2019). Promoting short and alternative food supply chains in the EU: the role of agroecology (own-initiative opinion) <https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/promoting-short-and-alternative-food-supply-chains-eu-role-agroecology-own-initiative-opinion>

Gaps identified from the technical analysis	Proposed action
<p>position of small farmers in the food supply chain, possibly leading to higher incomes.</p> <ul style="list-style-type: none"> — MSs are implementing short chain procurement through a variety of mechanisms, including criteria favouring local production, small farmers and SME's. The lack of common definitional framework could also pose challenges to an even playing field in the EU. — This is a controversial topic in the scope of public procurement. Existing studies recognise that local procurement is relevant and needs to be addressed; however, there are concerns on the need to ensure compliance with Directive 2014/24/EU. For example, suppliers cannot be favoured based on size due to the principle of non-discrimination and because the issue of small-scale farmers relates to the size of the supplier, rather than to the goods or services being purchased (link to the subject-matter requirement). — The fishery sector should also be taken into account, even if it is more difficult to apply outside coastal regions and due to high share of imported products. 	<p>reference to 'short supply chains'. For this, an initial definition was proposed under Reg. EU 1305/2013, which can be understood as involving as few economic operators as possible and fostering cooperation. Upcoming legislative developments on this matter could help better guide the application of this criterion.</p> <ul style="list-style-type: none"> — Careful drafting is required to balance stakeholder priorities, actual impact and alignment with other policies. — Clearly define the objectives to be reached in drafting criterion. <p>Further actions to be considered beyond the scope of this report:</p> <ul style="list-style-type: none"> — Identify for which products this criterion could be more effective (fruits/vegetables/meat/dairy/fresh products). — Identify procurement strategies that can be used for further support (see Annex 3).

Source: Authors' own elaboration.

CPC / AC 2. Short food supply chains
<p>Up to [X] marks can be assigned for products coming from short food supply chains as defined by EU regulation, where "short supply chain": means a supply chain involving a limited number of economic operators, committed to cooperation, economic development, and social relations between producers, processors and consumers.</p> <p>The number of intermediaries shall be maximum X (X=shall be decided by the contracting authority based on the product and supply chain and not exceeding 4).</p> <p>This criterion can be facilitated by the use of TS X on Traceability.</p>
<p><u>Verification</u></p> <p>Reporting the number of intermediaries involved in the food supply chain from primary production (including agriculture and fisheries) and the contracting authority.</p>
<p><u>Best practices and examples</u></p> <p><i>Balearic Islands (Spain)</i></p> <p>According to recent regulatory changes, any menu planning under public contracts must now include at least 16% of ingredients sourced from ecological and/or seasonal products, directly purchased from producers or their cooperatives and organisations. This measure directly supports the region's agricultural sector while aiming to reduce the carbon footprint associated with food transportation. The Balearic Agrarian Law (Law 3/2019) reinforces the importance of sustainability in agricultural practices. To ensure transparency and traceability from the outset, suppliers (adjudicatarios) are required to present a detailed list of their ecological or local agri-food suppliers—whether individuals, groups, or organisations—at the beginning of each contract.</p>

(Art 144 - Ley 3/2019, de 31 de enero, Agraria de las Illes Balears³⁹)

Avignon (France)

Avignon has developed innovative procurement models whereby the municipality purchases whole carcasses and establishes a partnership with the local vocational school (lycée professionnel). This partnership enables the school to perform the butchering free of charge, thereby transforming the product into portioned and packaged cuts suitable to supply school canteens within the framework of collective catering services.

Others

- The tenderer may set aside smaller contract slots for the purchase of specific products coming from short chains or organise a market dialogue (pre-procurement market engagement).
- Public authorities could draft directories of suppliers that handle products from short supply chains.
- The tendering format could be simplified to ensure flexibility and ease the administrative burden for farmers.
- Experiences are emerging related to ‘dynamic food procurement’, which is a solution offering a digital marketplace where food producers and buyers can connect easily. By eliminating numerous entry obstacles for suppliers, it can simplify tender participation for SMEs and farmers and has been trialled by various countries and local authorities⁴⁰.
- Guidance on including short chains in public procurement Strength2Food (2021a; 2021b).

More information on strategies that support the implementation of this criterion can be found in **Annex 3**.

³⁹ <https://www.boe.es/buscar/pdf/2019/BOE-A-2019-3911-consolidado.pdf>

⁴⁰ <https://www.hansel.fi/en/procurement-info/dynamic-purchasing-system/>;
<https://www.crowncommercial.gov.uk/agreements/RM6279>; <https://interreg-baltic.eu/wp-content/uploads/2024/12/Circular-FoodShift-Dynamic-Food-Procurement-Workshop-Key-Takeaways-2024.pdf>

4 Food Services

The criteria for Food products (chapter 3) are to be applied also in food service and contract catering.

This chapter includes further specific criteria for Food Service, starting from the revisions and adaptations of existing EU GPP criteria (chapter 4.1) and new criteria (chapter 4.2).

As in chapter 3.1, proposed changes to existing EU GPP criteria are highlighted in grey and underlined.

4.1 Revisions and adaptations of existing EU GPP criteria

Revisions and adaptations of existing EU GPP criteria are included in the form of SC (selection criteria) and TS, following the original provisions.

4.1.1 Selection criteria – Food Services

Rationale: The technical analysis did not find substantial amendments to be done to existing EU GPP criteria. Minor modifications to the competences of the tenderer could be considered to improve their understanding.

Objective: Increase the use of the criteria by improving their wording, and encouraging the use of tools for a closer monitoring of SPP provisions.

Table 11. Gaps and proposed actions in food services.

Gaps identified from the technical analysis	Proposed action
<ul style="list-style-type: none"> — The EU GPP criterion focuses only on environmental sustainability. Selection criteria should encompass also the other sustainability dimensions. 	<p>For the SC:</p> <ul style="list-style-type: none"> — Possibly provide more guidance on terminology used in the criterion. — Include monitoring capacity of environmental and other sustainability impacts.

Source: Authors' own elaboration.

SC - Competences of the tenderer
<p>The tenderer must have relevant competences and experience in each of the following areas for which they would be responsible under the contract [<i>select as relevant to the specific contract</i>]:</p> <ul style="list-style-type: none"> - method statements for: <ul style="list-style-type: none"> — <u>Administrative knowledge relevant to contract delivery, including documentation, reporting, and regulatory compliance.</u> — <u>The planning of menus following the criteria for healthy and sustainable meals (TS 11), accounting for nutritional requirements for different age groups as indicated by criteria (TS 12.1 – AC 23).</u> — The prevention of food waste and safe redistribution of surplus food if/where applicable. — The prevention and management of other waste, how to be sorted out and disposed. — The measurement of the sustainability indicators proposed in TS32 of catering services, including at least the amount of plant-based food, food waste generated in the various stages within the control, other waste generation by waste stream, energy consumption, water consumption and fuel consumption if applicable. — Water and energy savings in equipment and operation and maintenance of the equipment (for the staff responsible for this).

- The appropriate dosage and handling of cleaning products and cleaning procedures.
- Waste management, including hazardous waste, monitoring and traceability documentation.
- Approaches to minimise the environmental impacts associated with transport, delivery and storage of food and consumables.
- Staff training on sustainability aspects, in particular on the menu planning, food waste prevention and resource (water, energy, waste) saving behaviours.
- Maximise the reuse or recycling of packaging and/or other waste and ensure safe disposal.

Verification

Evidence in the form of information and references (such as documented feedback from customers) related to the relevant contracts in the previous 5 years in which the above elements have been carried out. Records of staff training, and relevant qualifications shall also be provided.

4.1.2 Staff training

Rationale: Staff training is essential to guarantee a successful adoption of SPP. This has been already motivated in the current EU GPP (Boyano et al., 2019). Recent research (Tregear et al., 2023) further highlights how staff training and providing a desirable place of employment for food services staff can also influence the overall sustainability of public procurement. While food services staff should already be trained to handle food to respect safety and hygiene standards, additional training on sustainability relevant aspects can contribute to the implementation of SPP.

Objective: Encourage the application of this criterion by facilitating its understanding while providing examples for its implementation.

Table 12. Gaps and proposed actions in staff training.

Gaps identified from the technical analysis	Proposed action
<ul style="list-style-type: none"> — The criterion requires accompanying tools and guidelines on the aspects in which staff need to be trained on, but without providing explicit details to such guidelines. 	<p>For the CPC:</p> <ul style="list-style-type: none"> — Rephrase and provide examples on the importance of inclusive and accessible training with regards to sustainability aspects.

Source: Authors' own elaboration.

CPC 3. Staff training

The contractor must provide staff training on all sustainability aspects of the contract upon commencement of the contract and as part of the induction for any new joiners. Staff in charge of the planning of the menus according to the criteria listed in this document must receive training and guidelines.

The aspects to be covered in the training are:

- Menu and recipe design and planning, addressing specifically the implementation of healthy and sustainable diets, according to the relevant nutritional guidelines.
- Food waste prevention
- Energy and water saving cooking behaviours
- Waste sorting and management

The training should ensure that staff have knowledge of the SPP criteria, as presented in the current report, and especially those contained in chapter 6.

Verification

In the case of new hired staff, the contractor must provide on-site staff training on the method statements listed in the selection criteria (SC1).

For permanent and temporary staff whose contract is for more than one year, the contractor must provide update on-site training on the method statements listed in the selection criteria (SC1) at least once per year.

The contractor must report what type of training and the aspects covered to the contractor authority. The contracting authority may set rules for penalties for non-compliance.

Recommended values:

For permanent staff and temporary staff whose contract is for more than one year, 16 hours per year of on-site formation is a recommended value for the duration of the formation while for other temporary and short term staff must be proportional to the duration of the contract. Duration of the formation can be adjusted to the needs and conditions of the tenders.

Staff in charge of the preparation of the menus, particularly plant-based menus, must receive guidelines on how to prepare them whilst observing the recommended nutritional intake and decreasing the overall environmental impact attributed to the dishes.

The number of hours provided is an indication; contracting authorities can modify the amount based on their contexts. Duration, content and modality of training should also be defined by the contracting authority, and employee turnover or seniority should be taken into consideration. Specific contexts (hospitals, kindergarten) might require more specific or extensive training.

Best practices and examples

Berlin (Germany)

Berlin's canteens have developed a successful training method to increase plant-based and organic products at no extra cost to the kitchen. The "Berlin Method" in the context of "Kantine Zukunft" aims to ensure that the training they provide in kitchens is successful (in terms of meeting organic thresholds, increasing plant-based food, improving the uptake of new recipes, allowing kitchens to stay within the same budget). Ten clear and precise principles have been developed, including use of unprocessed, plant-based raw materials, especially vegetables, variable use of plant-based products, use of animal-based protein as supplement rather than main ingredient, seasonality in menu design, emphasis on culinary craftsmanship, reduce food waste⁴¹.

Success factors: clear, precise objectives, tools such as a digital learning platform, and a reward system for particularly efficient kitchens.

France

In 2021, the Collectif Les Pieds dans le Plat set up an operational arm specialising in training and support, with the creation of the cooperative society of collective interest (SCIC) Nourrir l'Avenir. In accordance with the values upheld by the association, *Nourrir l'Avenir* intervenes throughout France at the request of the entities in charge of collective catering (town hall, department, region, association, etc.), provided that there is a clear political will to move towards as much organic and homemade food as possible⁴².

Finland

In addition to vocational training opportunities for cooking staff, specific certificates can be earned by employees, namely the Environmental Competence Passport (Ympäristöosaava-passi) and the Nutrition Passport (Ravitsemuspassi). These are learning platforms and online tests aimed at enhancing the nutritional and environmental awareness of professionals working in commercial kitchens⁴³.

⁴¹ <https://kantine-zukunft.de/berliner-methode/>

⁴² <https://www.collectiflespiedsdansleplat.org/nosactions>

⁴³ <https://verkko-opisto.sydan.fi/course/index.php?categoryid=5>

Dordogne (France)

School canteen tenders incorporate award criteria that favour providers offering “nose-to-tail” cooking and specific training to their kitchen staff. This training equips cooks with the skills and confidence to prepare dishes using all edible parts of an animal—beyond just prime cuts—such as offal, bones for broths, and less commonly used muscle cuts. This approach ensures that if animal products are purchased, nothing goes to waste. It is noted that using this resource efficient method can lead to improved animal welfare and efficiency, as a greater proportion of each animal is used effectively, and fewer animals need to be slaughtered to provide the same volume of nutritious meals. This reduces pressure on animal production and enables suppliers to adopt higher animal welfare standards, including free-range practices and slower-growing breeds. The initiative also revives traditional French culinary knowledge and regional heritage, encouraging appreciation for a wider variety of ingredients and preparation techniques, and fosters cost-effectiveness as it enables canteens to manage costs without compromising nutrition or ethical sourcing⁴⁴

UK

The UK Vegan Society’s school catering training programme helps catering staff learn how to plan and prepare nutritionally balanced plant-based meals in line with sustainability objectives. This type of training is particularly relevant as public institutions seek to offer more plant-based options as part of climate and health policies⁴⁵

4.2 New criteria put forward

The sustainable public procurement criteria for Food Services listed in the following section have been drafted following the outcomes of the technical analysis of provisions at Member States level. The EU GPP criteria are already comprehensive in addressing environmental hotspots of food services; for this, the elements of novelty presented in this report mostly address social hotspots.

Other new criteria are formulated as well to introduce a more comprehensive framing of sustainability in food procurement by addressing food environments, innovation or traceability. Following the reasoning in chapter 2.2, based on current evidence and to foster uptake these are formulated in the form of AC and CPC.

4.2.1 Environmental impact monitoring

Rationale: Food supply chains are complex. From agricultural production, to transport, processing, meal preparation, packaging use and waste management, different variables can change the environmental footprint of a product, such as a meal prepared for consumption in a public setting. Ultimately, to understand the environmental impact of that product, and the precise strategies to reduce it, a quantitative approach should be applied. Life cycle assessment (LCA) can serve such a purpose. The aim of introducing this criterion is to push food service operators to target more specific actions to reduce environmental impacts. The criterion could be used especially by large food service enterprises or centralised cooking centres to further optimise their operations and to procure food products more sustainably. It should be noted that the application of this criterion should be carefully considered and is of difficult application to SMEs, as these might lack the expertise and resources to conduct full LCAs of their operations. However, simplified tools (as outlined in chapter 8.1) could still be applied to guide smaller players to understand the entity of environmental impacts.

Objective: Promote the use of monitoring and hotspot analysis of environmental impacts in their supply chains to take action towards progressive improvements to mitigate emissions, nutrient losses, resource use and pollution, and enhance carbon sequestration, by rewarding suppliers.

⁴⁴ <https://schoolfood4change.eu/blog/2024/12/18/a-fieldtrip-to-dordogne-where-change-is-100-organic/>

⁴⁵ <https://vegsoc.org/what-we-do/catering-training/school-catering-training/>

Table 13. Gaps and proposed actions in environmental impact reporting.

Gaps identified from the technical analysis	Proposed action
<ul style="list-style-type: none"> — Need to enhance the capacity to gather and share environmental impact data from supply chain actors. — Help tenderers and contractor understand the hotspots for more targeted action, enable improvements. 	<p>Further actions to be considered beyond the scope of this report:</p> <ul style="list-style-type: none"> — Understand if the criterion is more suitable to be included as an award criterion or a contract clause. — Base the verification of the criteria on LCA (e.g. Environmental Footprint methods, Environmental Product Declarations, ISO standards) or the EU Carbon Removals and Carbon Farming Certification (CRCF) Regulation (European Commission, 2024), when relevant.

Source: Authors' own elaboration.

AC 9. Monitoring of environmental impacts
<p>Up to [X] marks can be awarded to suppliers who can supply data on key environmental indicators, enabling comprehensive assessment of the environmental impact of the service provided.. The tenderer, together with the contracting authority, can participate in the reporting on environmental impacts. The tenderer must be able to supply data according to an agreed format form to enable quantification of at least the following: climate change, water use, acidification, eutrophication, and biodiversity. Food suppliers can also provide a justified analysis on the selection of certain products based on their verified environmental performance.</p>
<p>Verification</p> <p>Use of LCA to assess the environmental impacts of the procurement as well as to evaluate different offers. Prioritisation from recommended EC methods (European Commission, 2021a):</p> <ul style="list-style-type: none"> — Product Environmental Footprint Category Rules (PEFCR), when available; — Product Environmental Footprint (PEF)/Organisation Environmental Footprint (OEF); — Environmental Product Declaration (EPD); — LCA-based tools developed at regional/national level — Other LCA-based tools; — the relevant EU certification methodologies, implementing the EU Carbon Removals and Carbon Farming Certification (CRCF) Regulation (European Commission, 2024).
<p>Best practices and examples</p> <p>Tampere (Finland)</p> <p>The City of Tampere has estimated both the carbon and the biodiversity footprints related to procurement of goods and services and in more detail for food, energy and water, investments, waste management, and business trips ⁴⁶.</p> <p>France</p> <p>Additional contribution to best practices France Since January 1st, 2021, the AGEC Law (Anti-Waste and Circular Economy Act) requires local authorities and their groupings to include, in their annual purchases, goods originating from reuse, repurposing, or containing recycled materials, in proportions ranging from 20% to 40%, depending on the product category.</p>

⁴⁶ https://www.tampere.fi/sites/default/files/2024-01/JYU_Reports_34.pdf

Others

Chapter 8.1 provides a deep dive on the potential application of environmental monitoring methodologies.

4.2.2 Traceability

Rationale: Traceability and information sharing within public procurement criteria could support and strengthen the development of monitoring capacity of sustainability aspects across the supply chain, particularly with respect to environmental and social issues. The results of technical analysis suggest that there is both a need and an opportunity to go beyond the minimum standards set by current legislation, such as the General Food Law for food safety requirements, especially as sustainability requires an exchange of information across supply chain actors to verify and substantiate any claims. Transparency and information sharing is crucial both for procurement officials and for final consumers to make informed decisions about the products at the point of purchase. In the EU there is an increasing proliferation of different schemes with varying requirements (Sanyé Mengual et al., 2024b). These listed criteria are therefore meant as a nudge for food business operators to disclose relevant information with contracting authorities to facilitate the verification of sustainability claims.

Objective: Support monitoring requirements, get a better understanding of suppliers' working conditions and other sustainability aspects to improve the uptake of SPP benefits, and address limitations or incongruences faced. Implementing such a criterion can enhance the overall integrity and sustainability of public food procurement by providing precise the information for the verification of the other criteria.

Table 14. Gaps and proposed actions in traceability.

Gaps identified from the technical analysis	Proposed action
<ul style="list-style-type: none">— Several MSs provide examples of increased traceability requirements which encourage monitoring upstream the supply chain.— Enabling traceability along the supply chain could enable further monitoring of environmental and social issues.— Traceability could help identifying short supply chains.— Traceability is covered by the fisheries Control Regulation/General Food Law.— A lot of the sustainability information requested by the other criteria in this report can be retrieved only if food business operators put in place systems for the traceability of such information.	<p>For the AC:</p> <ul style="list-style-type: none">— Traceability requirements can include the sustainability information, which is currently not mandatory under the minimum requirements of current legislation.— Traceability in this context refers to information disclosure with the contracting authority which could further benefit the mainstreaming of monitoring. <p>Further actions to be considered beyond the scope of this report:</p> <ul style="list-style-type: none">— Digital reporting tools or templates for suppliers can simplify information disclosure

Source: Authors' own elaboration.

CPC 4. Traceability

Suppliers commit to sharing information regarding the origin or production practices of the food used in their operations. This applies specifically to fruits, vegetables, meat, dairy and fishery and aquaculture products.

- Production practices, which can include agricultural management, especially related to the issues raised in AC4 to AC7.
- Working conditions as in CPC 1.
- Origin, which refers to the country of production or country of production of the ingredients (if up to X%).
- Any intermediaries between the producer and purchaser, which must be identified to facilitate the implementation of this CPC.

Verification

Information about the origin of all food and drink products provided under the contract, and the intermediaries involved (where relevant) must be included *in [to be determined by contracting authority: quarterly, six-monthly or annual] contract reports*. Traceability systems should respect existing data protection regulations.

Best practices and examples

Finland

Traceability of fish in fish products⁴⁷

If the product contains over XX% of fish, information on the batch of fish used for the product must be available on request indicating at least the following batch-specific details:

- Production method (wild-caught/farmed);
- The area where the fish were caught or farmed;
- The trade name and scientific name of the species;
- The percentage share (xx) must be specified on a case-by-case basis through market dialogue with the procurement body.

4.2.3 Working conditions and inclusion of vulnerable groups in food services

Rationale: In 2021, the Commission issued the “Buying Social” communication targeting specifically socially responsible procurement. A recent analysis of social procurement (Caimi & Sansonetti, 2023) underscores how the social dimension might be lagging in implementation compared with GPP and requires a further boost. This criterion covers aspects already described under the food section, which address other segments of the supply chain.

Objective: Ensure that services provided in public canteens respect working conditions and the integration of less-advantaged groups in the workforce and support the application of social procurement. Empower groups with less opportunities in the job market and support social inclusion as well as social innovation.

⁴⁷ <https://kriteeripankki.fi/en/c/120>

Table 15. Gaps and proposed actions in working conditions and inclusion of vulnerable groups.

Gaps identified from the technical analysis	Proposed action
<ul style="list-style-type: none"> — Social procurement has evolved in parallel to the EU GPP criteria, as social provisions are included transversally in procurement (European Commission, 2021b). — There are examples of public authorities awarding companies integrating the socially vulnerable groups or social enterprises. — In terms of application to food services, the technical analysis did not find examples of application of this type of provision, but that might have been due to the limited scope of the data collection. 	<p>For the AC:</p> <ul style="list-style-type: none"> — Draft criteria focused on addressing barriers faced by vulnerable groups, taking into account existing guidance, for example the Disability Employment Package. <p>Further actions to be considered beyond the scope of this report:</p> <ul style="list-style-type: none"> — Further research is needed to design possible criteria, especially understanding the link to the subject matter. — Carry out further research, as existing evidence already points out at the need to further promote coherent policies to support vulnerable groups.

Source: Authors' own elaboration.

CPC 5. Working conditions and inclusion in food services
<p>Suppliers implement traceability/due diligence mechanisms to ascertain that working conditions in food services are in line with existing national and international labour laws, including freedom of association, collective bargaining, and adequate wages.</p> <p>Actions promoting gender equality, inclusion of persons with disabilities and measures against violence and harassment in the work should be put in place through workplace initiatives.</p> <p>Promotion of health and safety aspects at work should be ensured through awareness raising.</p>
<p>Verification</p> <ul style="list-style-type: none"> — Firms under due diligence mechanisms and Corporate Social Responsibility reporting (as Directive (EU) 2022/2464), or those that do not meet the size criteria established in the regulation, could voluntary report what is described in chapter 6a, Article 29, section 2b. — Directive (EU) 2024/1760 on Corporate Sustainability Due Diligence. — Documents regarding the regular employment of food service workers and/or proof that contracts are stipulated according to collective bargaining agreements/ report on the percentage of workers paid a living wage. — Standards such as Global Reporting Initiative (GRI) on this matter (GRI, 2022). — Code of conduct drafted by the contracting authorities.
<p>Best practices and examples</p> <p>The Netherlands</p> <p>Inclusion of the Social Return on Investment (SROI) methodology in the awarding of food catering contracts (In Dutch: PianOo⁴⁸, Criteria on Food Services: social return⁴⁹).</p> <p>Finland</p>

⁴⁸ <https://www.pianoo.nl/en/sustainable-public-procurement/spp-themes/social-return-investment-sroi>

⁴⁹ <https://www.mvicriteria.nl/en/webtool#/19/2/en>

Procurement contracts stipulated by Hansel, the central procurement agency, require signing of “Code of Conduct” attachments, outlining the ethical and responsible operations expected from the Supplier in the production and provision of services. Some key aspects can include the following:

- Operations are transparent and abide by existing legislation, securing safe and fair working conditions;
- Equal treatment across gender, age, ethnicity, and other characteristics is mandatory. Discrimination is strictly prohibited, and affirmative action should support systematically disadvantaged groups;
- Services and infrastructure should align with sustainable development, leveraging innovations for environmental benefits;
- Employees have the right to form unions and participate in collective bargaining, and they should be informed about these rights clearly;
- A hazard-free environment is maintained, providing appropriate training, emergency plans, and ensuring occupational healthcare;
- Permanent jobs are favoured by written contracts, ensuring pay and working terms are understood and align with applicable laws or collective agreements;
- Overtime is voluntary and compensated according to the highest applicable standard, with clear stipulation in wage statements.

Operations must be transparent and abide by applicable laws, securing safe and fair working conditions.

Other

- Gender Responsive Procurement Urbact⁵⁰;
- Buying Social guide (European Commission, 2021b);
- #WeBuySocialEU – Making Socially Responsible Public Procurement Work: 71 Good Practice Cases - Food and catering services (European Commission - Executive Agency for Small and Medium-sized Enterprises. (2020));
- Choosing best value in contracting food services - EFFAT (2019);
- Training Material of the WeBuySocialEU Project 2023-2025 ⁵¹.

Other considerations, which can be introduced in public procurement to enable the inclusion of social aspects:

Reserved contracts for social enterprises

Empowerment of social groups involved in social enterprises (food services)

Additional marks can be awarded to food services employing workers coming from vulnerable groups or that operate as a social enterprise.

Note: what constitutes a disadvantaged group might change according to socio-economic context of the MS. Disadvantage groups can include, but are not limited to: persons with disabilities, long-term unemployed, living as a single adult with one or more dependants.

Verification

- Disclosure of type of worker by group (e.g. by age, gender, disability) (in compliance with GDPR).
- Provide statements of Diversity and Inclusion Policy used and provide evidence that staff receive regular training.
- Reporting on the use of indicators such as Social Return on Investment (SROI) to quantify the benefits of employing socially disadvantaged groups.

⁵⁰<https://urbact.eu/toolbox-home/introducing-gender-responsive-public-procurement-and-its-legal-framework-14>

⁵¹ <https://www.aeid.eu/webuysocialeu/training-events/>

4.2.4 Food environment in canteens

Rationale: Food environments are defined as the physical, economic and socio-cultural contexts in which people engage with food to make decisions (HLPE, 2017). They are increasingly the object of research and receiving attention by policymakers (SAPEA, 2023). Especially the physical organisation of how food is served, and how communication is handled could potentially impact consumer choices and behaviours (WHO, 2022b; Metcalfe et al., 2020). As food service providers can play a key role to shape specific aspects of the food environment, a criterion is introduced to ensure that the food environment is organised to facilitate healthy, attractive and sustainable choices. This criterion is particularly relevant for schools and kindergartens as children represent a key target group.

Objective: Make the sustainable choice the easier choice to consumers, create a pleasant eating environment. Ensure that healthy and sustainable foods and drinks are accessible, affordable and desirable.

Table 16. Gaps and proposed actions in food environment in canteens.

Gaps identified from the technical analysis	Proposed action
<ul style="list-style-type: none"> — The food environment is currently not an aspect identified within EU GPP criteria. — Food services stakeholders are pivotal to help shaping the food environment where customers make decisions and are nudged towards healthier and more sustainable choices. — Communication about the availability and offer of organic products in food services is unclear. The role of labelling also in food service settings could be explored further. 	<p>For the CPC:</p> <ul style="list-style-type: none"> — Propose a criterion requiring food service operators to provide a healthy, accessible and sustainable food environment. The type of criterion would need to be decided in collaboration with stakeholders, as it could be included in the selection criteria or a different type of criteria. — The key elements should include the requirement to make the healthier and more sustainable option the most visible, available and attractive (when there is the option for choice). — In educational environments, information should be clearly given to parents or guardians on the food served. — Accessibility (in terms of language and understanding) is to be considered. — Inclusivity is also taken into consideration, accounting for dietary differences due to cultural aspects. <p>Further actions to be considered beyond the scope of this report:</p> <ul style="list-style-type: none"> — A checklist of elements of what constitutes a healthy, accessible and sustainable food environment could be drafted to accompany the criterion and facilitate inclusion in tenders and possibly verification. — Insights from behavioural science could be applied in devising such a checklist. — Further research should be conducted on the interventions that can be put in place to favour healthy and sustainable choices (Frerichs et al., 2015).

Source: Authors' own elaboration.

CPC 6. Food environment

The tenderer has policies or action plans which ensure a healthy and sustainable food offer in catering establishments.

- When choices are made available to consumers, the healthier and more sustainable choice is made appropriately available and visible. Appropriate language should be used in proposing sustainable and healthy meals according to the context. Information on food environment aspects shall be provided to parents or guardians on the food served.
- Accessibility to information on food served (for language/cultural reasons, disability, or for specific allergens) is clear and unambiguous.
- In educational settings, information about the food served should be provided to parents or guardians. This includes nutritional and allergen information.

Verification

Routine checks of the environment; the contracting authority could provide a checklist of elements to put in place, tailored to the specific context for which is procuring the food.

Best practices and examples

The Netherlands

In their SPP criteria, the Netherlands include a specific criterion on “healthier offer and appearance” providing a reference to the Healthier Canteen Guidelines issued by the Nutritional science authority.

Extract: “Appearance: The tenderer must comply with writing an action plan with regard to the appearance of the catering establishment, which plan visibly incorporates the points of appearance of the Healthier Canteen Guidelines.” (Netherlands Nutrition Centre, 2017)

Germany

When using non-standard or ambiguous names for dishes, it is important that the main ingredients of the dish are indicated on the menu. This is especially relevant in case of use of meat products, where the species should be clearly stated⁵².

Spain

Newly introduced legislation on school canteens requires clear communication of food-related information to parents or guardians in educational environments. According to Article 11 of this regulation, educational centers must provide families, guardians, or responsible parties with clear and detailed monthly menus. These menus should guide them in planning complementary suppers aligned with the current dietary recommendations of health authorities. For students with special dietary needs, specific menus are also communicated to parents or guardians. The information must include dish names, cooking techniques, sauces and side dishes, as well as a list of allergens. For desserts, the type of fruits or dairy should also be indicated. This information is made readily available on bulletin boards, school websites, or other easily accessible media for all families and guardians utilizing the school canteen, either regularly or occasionally. Additionally, this information should to be accessible to individuals with disabilities (Ministerio de la Presidencia, Justicia y Relaciones con las Cortes, 2025).

Italy

Noise can be key barrier to meal acceptability and satisfaction, especially in schools. Italian regulation introduces an AC for bidders who install noise reduction devices in kitchens and dining areas (Gazzetta Ufficiale).

Others

More information is available in chapter 8.5.

⁵² <https://www.dge.de/english/dge-quality-standards/>

4.2.5 Education and awareness raising

Rationale: Consumer behaviour awareness and change are important levers for sustainable consumption. Dietary shift and food waste reduction (chapter 3) are crucial in reducing environmental impacts of the food system, and while consumer behaviour is outside the scope of public procurement, contracted food services can enable change by facilitating or even participating actively in educational and awareness raising activities. By incorporating a requirement to participate in education and awareness raising interventions, stakeholder collaboration could be facilitated.

Objective: Ensure better collaboration among stakeholders within the scope of public procurement to promote awareness and behavioural change across all actors of the food supply chain.

Table 17. Gaps and proposed actions in education and awareness raising.

Gaps identified from the technical analysis	Proposed action
<ul style="list-style-type: none"> — Food service operators are crucial to put in place interventions targeting consumer food waste and a shift to sustainable diets. — Stakeholder engagement and collaboration is key to launch effective interventions. — While this aspect is particularly relevant for schools and educational environments, it can also be important for all public institutions including care centres. 	<p>For the CPC:</p> <ul style="list-style-type: none"> — Propose a criterion requiring food service operators to participate in education or awareness raising activities launched in the context of their meal provision. <p>Further actions to be considered beyond the scope of this report:</p> <ul style="list-style-type: none"> — Carry out further research for more specific requirements on type of activities which could be included to ensure feasibility; examples from real life settings could also be provided.

Source: Authors' own elaboration.

CPC 7. Participation in awareness raising and education activities
<p>In the case the contracting authority or other involved stakeholder launches interventions aimed at increasing the awareness of consumers or in case of school settings, at educating younger generations about food, the contractor shall facilitate the deployment of such intervention and actively participate. The contracting authority may set rules for penalties for non-compliance.</p>
<p>Best practices and examples</p> <p>Bergamo (Italy) It includes in the minimum selection requirements for the food service contractor to be available to participate in educational activities in schools (carrying out initiatives to educate people about a balanced diet and taste especially for the education sector).</p> <p>Asociación JanGela.Mesa de AMYPAS de Navarra (Spain) In 2022, a significant tender was released for the operation of public-school canteens in Navarra, Spain. This aimed not only to meal planning and supervision, but also to foster a broader shift towards health and sustainability. This change was largely due to the mobilisation of families through the association JanGela, and the advocacy efforts of the Navarra Public Purchase Group and the Council for Organic Agricultural Production of Navarra. A key aspect of the tender is the introduction of robust healthy eating programs for families. This new approach has had a substantial impact on the development and strengthening of Navarra's organic primary sector. Among the criteria, tenders evaluated: "Having a waste and food waste management plan is valued, and Providing families with training in healthy eating is valued".</p> <p>Torre Vedras (Portugal)</p>

In Torres Vedras (Portugal) beyond the fresh, seasonal and traditional ingredients used to prepare dishes, the city mandates local farm visits, culinary and horticultural classes, as well as lessons on healthy dietary habits for students. This comprehensive strategy aims to elevate children's appreciation for school food and instils wholesome eating practices that extend to families and a more wholesome food culture⁵³.

Whole School Food Approach

The Whole School Food Approach (WSFA), developed by the SchoolFood4Change project (2022), is a comprehensive strategy aimed at integrating food consumption, education, communication, and promotion in and around the school setting. This approach involves a full alignment of food-related activities with the school's overarching vision. The WSFA emphasises the importance of a coordinated effort among various actors both inside and outside the school to consistently promote healthy and sustainable food choices. The relevance of the WSFA lies in its ability to effectuate behavioral change in children by making it easier for them to understand and adopt healthy, sustainable eating habits. Since children are highly susceptible to environmental influences and may lack the capacity to make informed food choices, a cohesive and supportive food environment is crucial. By uniformly advocating for healthy and sustainable food practices, the WSFA helps bridge the gap between knowledge and action, potentially leading to better long-term eating habits among students.

Implementation of the WSFA is particularly important when developing tenders for school food services. It ensures that criteria related to both the school food environment and educational practices are incorporated, maintaining consistency with the school's vision of promoting health and sustainability. Practical experiences in different European cities have demonstrated the WSFA's efficacy as a suitable method for instigating nutritional behavior changes in students, underscoring its importance in educational settings (see also Annex 2) (School Food 4 Change, 2022).

⁵³ <https://www.cm-tvedras.pt/educacao/saude-e-alimentacao/programa-de-sustentabilidade-na-alimentacao-escolar/>

5 Vending machines

The sustainability of vending machines is associated with the packaged foods that are placed inside, as well as the operation of the machine and the purchase of new ones. The environmental criteria introduced by the **EU GPP are comprehensive and therefore do not require changes**⁵⁴.

However, the **nutritional aspect** of vending machines is crucial, as they may offer foods and drinks high in fat, sugar and/or salt (Grech and Allman-Farinelli 2015). The analysis of existing criteria (García-Herrero et al., 2024) showed that, in some instances, MSs have banned vending machines in schools. However, more research focused on vending machines and their role in food environments is needed before this measure can be recommended to all MSs (Kovacs et al., 2020).

Overall, it is recommended that the offer of products in vending machines shifts towards healthier snacks, potentially including fresh fruits and vegetables and more healthy snacks based on wholegrain cereals and nuts. The inclusion of fruits and vegetables should, however, account for the potential for increased food waste due to increased perishability and the possible logistical challenges related to restocking the vending machines with fresh products. Alternative means of providing healthy snacks in public settings are being implemented already (Methner et al., 2017), such as the School Scheme promoted by DG AGRI and national authorities supporting the consumption of fruits and vegetables in schools⁵⁵.

Objective: The objective of the technical specifications below is to ensure that foods and beverages high in salt and free sugars are limited, while water is promoted. Provision of low impact drinking water was already included in the existing EU GPP and no changes are proposed in these new SPP criteria (please see Table 1).

Product placement and visibility in vending machines

When vending machines have a viewing window through which the buyer sees which products are selected; healthier and sustainable food product options shall be featured more centrally or prominently in the viewing window.

Here are the technical specifications for foods sold in vending machines:

TS 10. Nutritional criteria for food sold in vending machines

Refrigerated or ambient vending machines, which typically offer cold drinks, snacks, sandwiches, salads, dairy products, fruits

The tenderer shall ensure that:

- In school and other settings aimed at children under 18 years of age, while it is recommended to offer foods and drinks to this age group through a canteen service, if this is not feasible, the following criteria shall apply:
 - Only packaged food and beverages with <5 g of sugars per 100 g for solids or <2,5 g of sugars per 100 ml for liquids) and <0.3 g of salt (<0.12 g of sodium) per 100 g are sold in vending machines. This sugar limit shall not apply to dairy products without added sugar content (e.g. added sugars, honey, syrups, fruit purées/concentrates/juices/jam, sweetened additives), fruits and vegetables. Children under 3 years shall not be offered free sugars, therefore, this criterion on sugars does not include them (see section 6.2.3)

⁵⁴ The changes proposed for the food criteria for organic food (section 2.1.1) would not apply to vending machines, as only packaged products can be introduced in the machines, and for these certifications would have already been obtained.

⁵⁵https://agriculture.ec.europa.eu/common-agricultural-policy/market-measures/school-fruit-vegetables-and-milk-scheme/school-scheme-explained_en

- Energy drinks, sugar- and non-sugar sweetened soft drinks, and food containing non-sugar sweeteners, are not allowed.

— For other settings and age groups above 18 years, a minimum of 75 % of the total offer of food and beverages in vending machines consists of products with <5 g of sugars per 100 g for solids or <2,5 g of sugars per 100 ml for liquids) and <0.3 g of salt (<0.12 g of sodium) per 100 g. This sugar limit shall not apply to dairy products without added sugar, fruits and vegetables.

— Water availability: When drinks are offered in the vending machine, unflavoured plain water shall also be provided and placed in a prominent position.

— The TS included in section 6.2. also applies to food and beverages sold in vending machines.

Hot vending machines, which typically offer hot beverages (coffee, tea, hot chocolate)

The tenderer shall ensure that:

— The default selection in the menu shall be without added sugar or other sweetening agents.

— They shall not be installed in schools and other settings serving children under 18. If present (e.g. in staff rooms), access by children must be strictly prevented.

Verification

List of products sold nutritional information on prepacked products (inspection).

General recommendations for food placement in vending machines that have a viewing window:

- Health-promoting products: ensure that healthier options (e.g. unsalted nuts, fruit) are prominently displayed and centrally positioned within vending machines. For instance, position these items in the upper third of the sales series or the middle of the product offerings.
- Height-sensitive products: it should be noted that certain healthy products, such as fruit, should not fall from a height. Therefore, vending machines with lift systems or drum machines should be prioritised for these items. If such machines are unavailable, the previous recommendation of placing healthier products at eye level cannot be applied. Instead, and if the technical functioning and type of machine allow, these products should be placed the lowest range of sales area to minimise the risk of damage during dispensing.

6 Horizontal criteria

This section contains the SPP criteria which can be applied regardless of the procurement organisation and are likely to achieve the **highest benefits in terms of environmental and social impacts**, leveraging on a system approach to foster sustainability transitions. As such, these criteria can apply to food products (chapter 3), food services (chapter 4), and vending machines (chapter 5).

These horizontal criteria include **support to menu planning for healthy and sustainable meals, food waste** prevention, and **monitoring** of sustainability indicators. These criteria shall apply regardless of the organisation of the procurement. This means that they apply to both food and food services and are key to achieve a more sustainable food system.

6.1 Healthy and sustainable meals

Rationale: Public food environments play a crucial role in promoting healthy eating habits among the population and shaping consumption patterns, especially for future generations who are developing their relationship with food in schools and other educational environments. These SPP criteria aims at providing guidance on how to design and implement healthy and sustainable meals, promoting plant-based diets. Increasing the consumption of fruits, vegetables, legumes, nuts and seed, and whole grains and reducing the intake of meat is the most promising strategy to reduce the overall environmental impact of food procurement and improving population health (Prag et al., 2023; Batlle-Bayer et al., 2021).

It should be noted that seasonality, food quality and cultural appropriateness are also key elements of a sustainable diet. However, as these aspects are highly context dependent, no overarching guidance can be issued at this stage. The gradual integration of EU SPP criteria is to complement existing national frameworks, which is crucial as it promotes consistency in public messaging, ensures policy coherence, and avoids conflicting recommendations.

Several MSs have increasingly recognised the importance of reducing the consumption of some animal products to promote sustainable and healthy diets, albeit the policy instruments used to do so can vary (Bundesministerium für Arbeit, Soziales, Gesundheit, Pflege und Konsumentenschutz, 2024; Ministry of Food, Agriculture and Fisheries of Denmark, 2023, Ministero de Consumo, 2022).

Meal design shall include also aspects related to nutrition (section 3.1.1) and, although not within the scope of the criteria in this report, the procurer should take note of specific conditions (e.g. certain disabilities or religious beliefs), based on needs of the local setting or MS. The raw materials used in the menu planning shall be procured in compliance with the SPP criteria for food (chapter 3).

This report recognises the **complexity** of aligning **multiple objectives** in menu planning, such as environmental sustainability including food waste prevention, nutritional requirements, and taste, while managing food expenditures and reduced budgets for public administrations. However, the importance of the **dietary shift** in food sustainability cannot be understated, both from environmental and public health perspectives, as confirmed by extensive scientific evidence (see García Herrero et al., 2024; Casonato et al., 2024). To ensure the success of these changes, and particularly for horizontal criteria, a gradual approach is necessary, allowing time for adaptation by producers and acceptance by end users. Finally, **collaboration** with stakeholders in meal design is key for the **acceptability and application of menu changes**. Communication with consumers needs to be transparent and accessible, enabling them to make informed choices; it has been noted

that signalling certain dishes as “vegan” or “plant-based” might deter choice. This should be taken into consideration based on the context (Sleboda et al., 2024).

Relevant stakeholders include cooking staff, parents and consumers – including children in case of school environments, and nutrition specialists. The importance of stakeholder engagement is further elaborated in chapter 8 and should be considered as a general approach to SPP rather than a criterion for tenders, as, for example, governance structures such as “canteen committees” can be established.

Objective: Guarantee the provision of healthy and sustainable meals. The following criteria can be included in contracts for food services and prepared meals; they can be applied across all public settings. If only food is procured, the operational aspects of these criteria can be applied by the public authority tasked with designing menus.

Table 18. Gaps and proposed actions in horizontal aspects.

Gaps identified from the technical analysis	Proposed Action
<ul style="list-style-type: none"> — Nutritional and health aspects were not considered within the scope of EU GPP criteria; this approach could be reductionist for the scope of SPP, as health and nutrition play a key role in the sustainability transition. — EU GPP contain the criteria “plant-based menus”, without expressively incorporating nutritional or other elements. — The EU GPP lacks a systemic view of diets and menu planning, which should account for many different aspects. — The EU GPP criteria do not connect to specific guidance on supporting the implementation of the criteria (i.e. improve menu and recipe planning). 	<p>Healthy and sustainable meal planning is a key action for a shift to sustainability in food systems.</p> <ul style="list-style-type: none"> — Provide a glossary of terms to have a common understanding of plant-based and different dietary patterns. <p>For the TS:</p> <ul style="list-style-type: none"> — Introduction of TSs for nutritional aspects. — Revision of wording for plant-based menus. — Integration of nutritional and health aspects in meal planning by providing criteria/information for plant-based menus as well as specific nutritional criteria. <p>For the AC:</p> <ul style="list-style-type: none"> — Introduction of ACs for nutritional aspects. — Introduce aspects of seasonality and dietary diversity to address sustainability comprehensively (Hunter et al., 2019). <p>Further actions to be considered beyond the scope of this report</p> <ul style="list-style-type: none"> — Develop tools which could help public authorities and food services in designing meals and menu rotations to optimise environmental and nutritional outcomes. — Inclusivity and accessibility should also be considered in menu planning and provision of meals. — Adaptation of criteria to different dietary patterns could be necessary. — Taste and quality aspects of menu planning need to be included in the narrative of sustainable diets but are highly subjective and can relate to cultural aspects. The development of recipes and meals that are sustainable, nutritious, tasty might require specific culinary skills. Further research in how

	culinary and gastronomic sciences can help in crafting healthy and sustainable meals could provide further insights in implementation of this criterion.
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Source: Authors' own elaboration.

TS 11. Healthy and sustainable meals
<p>Meals and recipes shall promote plant-based diets (see Glossary in section 1.2). Meals and menus shall be designed to promote the consumption of whole grains, fruits, vegetables, pulses, nuts and seeds while ensuring that these meals remain healthy and nutritious.</p> <p>The following approaches <i>[to be selected]</i> can be selected at the discretion of the contracting authority when drawing the tender:</p> <ul style="list-style-type: none"> — X meat and fish free day(s)/per week, whereby these animal products are not offered (X = exact number of meat and fish free day(s)/per week to be decided by the contracting authority). — A minimum of X vegetarian meals are offered daily (X = exact number of vegetarian dishes offered daily to be decided by the contracting authority). — If more than one choice is provided to consumers, at least 1 vegetarian dish has to be offered daily. — Specific criteria for the consumption of Meat and Fishery and aquaculture products are included in following sections 6.2.5 and 6.2.6. Red and processed meat shall be progressively reduced. — Meat dishes shall be bulked up (X %) with pulses, whole grains or vegetables. <p>Animal products can be offered according to existing dietary guidelines (national or international guidelines such as from WHO) to ensure nutritional adequacy, especially for sensitive demographics (children, elderly, hospital patients). When vegetarian or vegan alternatives are provided, these shall not come at extra cost for the consumer compared with the animal-based options.</p>
<p>Verification</p> <p>The tenderer must provide a representative selection of the menu planning and recipes to ensure compliance with the technical specification.</p>
AC 10. Dietary diversity and seasonality
<p>Up to [X] marks will be awarded to suppliers who offer meals and menus with greater dietary diversity and seasonality in their offer.</p> <p>a) Dietary diversity means an increase variety of products coming from underutilised or underexploited crops and species. These can take the form of:</p> <ul style="list-style-type: none"> — underutilised plant species and heritage plant varieties (examples can include cereals and grains: millet, barley, buckwheat, spelt, oat; pulses: peas, lentils, beans, chickpeas, fava beans; heritage varieties) or underexploited fish species*. <p>Availability of products will depend on the market context of the contracting authority and the contracting authority can devise lists of products to be promoted for inclusion in tenders.</p> <p>b) Seasonality needs to be defined by the contacting authority and a reference in the form of a calendar has to be provided for its inclusion in the tender. Seasonality refers especially to fruits, vegetables, but in certain cases can also apply to wild fish products.</p> <p>*For underexploited fish species, animal welfare considerations need to be taken into account (see chapter 3.1.2 on fishery and aquaculture).</p>

Verification

The tenderer shall provide a representative selection of the menu planning and recipes to ensure compliance with the award criteria. The tenderer can decide what constitutes an increased variety of species in accordance with experts in nutrition and/ or dietetics and provide a list of products that meet the criteria listed above.

The definition of seasonality needs to be coupled with a calendar of fruits and vegetables drafted by authorities.

Best practices and examples

To introduce less-known specialty products, including underutilised species and those with geographical indications, consider featuring them periodically through themed menus that change frequently. This approach gives consumers time to try new flavours and develop their tastes and allows small producers to assess demand and adjust their supply accordingly (Case Study on the introduction of legumes in public settings, Slow Food, 2023).

Examples of implementation of more plant-based procurement (European Vegetarian Union, 2023).

CPC 8. Healthy and sustainable meals

The tenderer shall ensure that all meals are designed, calibrated, and regularly monitored at least on an annual basis by registered professionals with accredited training in nutrition and/or dietetics. The meals shall be nutritionally balanced, health-oriented, and appropriate for the intended audience, meeting the specified technical requirements.

Best practices and examples

- It is crucial to ensure that the menus are designed, calibrated, and regularly monitored by registered professionals with accredited training in nutrition and/or dietetics. The menus shall be designed to meet the nutritional needs of the target audience (e.g. children, adolescents, adults, elderly or patients).
- The following strategies can be put in place to increase the plant-based components of recipes: substituting a portion of animal-based protein with plant proteins/legumes, gradually increasing the portion sizes and frequencies of vegetables, pulses and whole grains by bulking up animal-based recipes.
- Incorporation of plant-based menus shall be gradual to increase acceptance.
- Tools to help menu planning: The Strenght2Food project has published resources to support meal planning (Strenght2Food, 2022).
- If possible, a qualitative meal preparation tasting session can be organised by the contracting authority to evaluate the quality and taste of the meals.

Austria

Public sector kitchens must offer at least one vegetarian or vegan main dish every day that is seasonal and regional and contains at least one main ingredient from organic/ecological production (“Klimateller” or climate plate)⁵⁶.

Spain

Spanish regulation includes elements relating to cultural, ethical or religious aspects of food choices and invites public authorities to ensure that alternative menus are provided to cater to an increasingly diverse population. Accessibility and availability of information regarding allergens, ingredients are also included in the provision (Ministerio de la Presidencia, Justicia y Relaciones con las Cortes, 2025).

Netherlands

For the contracting of food service, the following criteria are put forth by the Dutch public authorities: the protein share in all purchased products is at least 60% plant based (this excludes drinks); for the presented

⁵⁶ https://www.nabe.gv.at/wp-content/uploads/2021/06/6_Lebensmittel-und-Verpflegungsdienstleistungen_naBe-Kriterien-1.pdf

offer of the catering, at least one plant-based option per product group should be included, and at least one plant-based dairy alternative. All options in the banqueting folder are without meat⁵⁷.

Flanders

The tenderer describes in the implementation plan how it considers seasonal environmental impact in vegetables and fruit. The Flemish Institute for Healthy Lifestyle provides tips and guidelines for implementation⁵⁸.

More in-depth examples are included in Annex 2.

Tools

- The Manifesto for establishing minimum criteria for catering proposes that public authorities include 2 days per week that are vegetarian or vegan, and that, in general, animal-based dishes are bulked up with up to 60% pulses and other plant proteins (EU Food Policy Coalition, 2022).
- Reviews of behavioural strategies to encourage the uptake of healthy and sustainable diets - Playbook for Guiding Diners Toward Plant-Rich Dishes in Food Service (WRI, 2020); The Food Service Playbook for Promoting Sustainable Food Choices (WRI, 2024).

6.2 Nutritional Criteria

Nutritional criteria had not originally been included as part of the EU GPP guidelines. However, healthy diets are a key aspect of sustainability, and integrating nutritional guidelines in sustainable public procurement across the EU can significantly promote healthier eating habits among the population, influence the food environment, reduce health inequalities, and have environmental impacts.

The Global Burden of Disease (GBD) study estimates that, in the European Union in 2021, 617984 deaths and over 11,5 million disability-adjusted life years (DALYs) are attributable to dietary risks due to unhealthy diets (GBD, 2021). This disease burden corresponds exclusively to NCDs. Most deaths attributable to dietary risks are due to cardiovascular diseases, neoplasms, diabetes, and kidney diseases. Similarly, DALYs attributable to dietary risks are mainly due to cardiovascular diseases, diabetes and kidney diseases and neoplasms (GBD, 2021).

In most European populations, the intake of nutrients of concern, such as saturated fatty acids (SFA), salt, and free sugars, exceeds current dietary recommendations, while dietary fibre intake falls below the recommended levels (European Commission, 2024a). When comparing food group intakes to Food-Based Dietary Guidelines (FBDGs) in the EU, consumption of fruit, vegetables, legumes, whole grains, nuts, and seeds, as well as dairy products and fish, is lower, and red and processed meat, sugar-sweetened beverages, and alcohol intake is higher than recommended (Springmann et al., 2020).

Overall, the technical specifications and award criteria for nutrition presented below have been developed by synthesizing findings from García-Herrero et al. (2024), considering existing nutritional criteria related to food public procurement already applied in 14 EU countries, and incorporating the latest dietary recommendations, with references added for support when necessary.

To facilitate easier implementation, multiple nutritional criteria analysed in García-Herrero et al. (2024) have been combined into broader categories. Moreover, the nutritional criteria detailed below also apply to food products (chapter 3), food services (chapter 4), and food and beverages sold in vending machines and cafeteria (chapter 5). As mentioned in the previous section, it is

⁵⁷ <https://www.voedingscentrum.nl/>

⁵⁸ <https://www.gezondleven.be/themas/voeding/voedingsdriehoek/gezond-leven-tips-bij-de-voedingsdriehoek>

crucial to ensure that the menus are designed, calibrated, and regularly monitored by registered professionals with accredited training in nutrition and/or dietetics.

It should be noted that in certain cases specific details on nutritional criteria cannot be common for all EU Member States, and in certain instances, for example on iodised salt usage or meat, may necessitate further adaptation based on national FBDGs. The nutritional criteria have been elaborated consistently with the criteria applied to the other sustainability dimensions and should take into account age-appropriate portion sizes.

Food safety or labelling issues, including food allergens, are outside the scope of the present criteria given that in the EU, such issues fall under EU legislation. Similarly, religious or cultural dietary needs fall outside the scope of this work and shall be managed by the procurer, based on the specific needs of each EU Member State.

The nutritional criteria listed below form a basis for offering healthy food, and as mentioned above, can be adapted, if necessary, based on national FBDGs.

Specific nutritional criteria for infants and children

Implementing specific nutritional criteria for public procurement for infants and children is a unique opportunity to address the growing issue of childhood obesity, help establish healthy eating habits, and improve overall health outcomes, particularly for vulnerable children. The World Obesity Atlas 2023 predicts that by 2035, 11 million girls and 17 million boys will have obesity (BMI ≥ 30 kg/m²) (World Obesity Federation, 2023), while in 2021, around 10% of children at risk of poverty or social exclusion did not have access to fresh fruits and vegetables or protein-based food daily (European Commission, 2021c).

Focusing on targeting nutrients and food groups of concern and promoting balanced consumption, has the potential to promote a healthy growth and prevent long-term health diseases, as this is a delicate period where eating habits are established and persist throughout life. For example, high calorie, salt, and free sugar intake can lead to childhood obesity, high blood pressure, cardiovascular diseases (CVD), and tooth decay. By establishing balanced nutrient consumption early on, we can foster optimal physical and cognitive development, promoting lifelong healthy eating behaviours. Children at risk of poverty and/or social exclusion are likely to benefit the most from the proposed nutritional criteria due to their increased vulnerability and the challenges (e.g. financial, educational barriers) they face in accessing healthy and nutritious food.

Moreover, the proposed nutritional criteria for infants and children, outlined below, align with the European Child Guarantee, which states that every child should have at least one healthy meal per school day (Council of the European Union, 2021). These criteria are also in line with other current European policies, including for instance Europe's Beating Cancer Plan.

6.2.1 Salt

Rationale: Excessive salt (one gram of sodium equals approximately 2.5 g salt)⁵⁹ intake elevates blood pressure which in turns increases the risk of CVD, the leading cause of death and disability in Europe (European Commission, 2023c). Salt intake typically ranges from 7 to 12 grams per day in Europe, which far exceeds the recommended values of less than 5 grams per day by the World Health Organisation (WHO, 2023a).

⁵⁹ 'Salt' means the salt equivalent content calculated using the formula: salt = sodium \times 2.5. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32011R1169>

For infants and young children below 24 months of age, WHO states that foods high in salt should not be consumed, and for children, it recommends adjusting the maximum sodium levels of intake according to their energy requirements relative to those of adults (WHO, 2023b).

Objective: The objective of the technical specification and award criteria below is to ensure that salt is used sparingly, in accordance with age-specific guidelines and health recommendations. The use of iodised salt is recommended as long as this is in line with FBDGs from each MS.

TS 12. Monitoring and age-appropriate management salt content in menus

TS 12.1. Monitoring salt content in foods and beverages offered

1. The tenderer shall:
 - a) Monitor both the grams of added salt and salt already present in food (e.g. bread).
 - b) Use standard recipes with a calculated salt content. The amount of salt present in foods (e.g. bread, processed meat) shall be considered when calculating the total salt of the menu.
 - c) Ensure that vegetables and boiled starchy foods such as rice, pasta and potatoes, are cooked without salt, salted broth or salted bouillon cubes.
 - d) Ensure that salt is not available on tables.

TS 12.2. Provide menus with age-specific salt content

The tenderer shall ensure the following for both added salt and salt already present in ready to eat foods:

1. Infants and children under 6 years:
 - a) Food prepared shall not contain added salt.
 - b) Infants and young children (< 3 years): Unsalted or low-salt bread (maximum 0.3 grams of salt (0.12 grams of sodium per 100g) bread shall be provided.
 - c) Foods containing more than 0.3g of salt per 100g of food (e.g. some ready to eat foods, cheeses, processed meats and processed fishery and aquaculture products), shall only be offered in small portions (e.g. <25g). These food items shall only be offered if explicitly deemed appropriate for this age group by the FBDGs of the Member State, and age-specific portion sizes shall be provided in accordance with FBDGs.
2. Children under 18 years old:
 - a) Salt shall not be freely available for adding to already prepared food.
 - b) All nuts and seeds offered shall be unsalted.
 - c) Children above 6 years: Foods containing more than 1g of salt per 100g of food (e.g. some ready to eat foods, cheeses, processed meats and processed fishery and aquaculture products), shall only be offered in small portions (e.g. <25g). These food items shall only be offered if explicitly deemed appropriate for this age group by the FBDGs of the Member State, and age-specific portion sizes shall be provided in accordance with FBDGs.
3. Children above 3 years and adults:

Bread with less than 1 gram of salt per 100 grams shall be provided.

Verification

At the time of bid submission, the tenderer shall provide relevant documentation on how this will be done, including for example documentation showing a representative selection of recipes and menus, where salt content will be reported.

TS 13. Iodised salt is used

The tenderer shall ensure that (these criteria may necessitate further adaptation based on national FBDGs):

1. When preparing food, iodised salt is used.
2. When purchasing ready-to-eat foods prone to high salt content (e.g. bread, bakery products), these items shall have been prepared using iodised salt. Exceptions may apply to certain products (e.g. processed meats) where the use of iodised salt may affect sensory quality, to avoid the addition of sugar or other sweeteners to balance out bitterness.

Verification

At the time of bid submission, the tenderer shall ensure that iodised salt will be used.

AC 11. Salt usage is limited

AC 11.1. Follow age-specific guidelines of salt intake:

Points are to be awarded to tenders that adhere to the maximum limits for salt (including both grams of added salt and salt already present in food) as specified by the European Food Safety Authority (EFSA), taking into account the age of the target population (EFSA, 2019)

Age group or setting	Grams/day of salt	Grams/lunch (25-40% total food consumed/day) ^a of salt	Grams/snack (10-20% total food consumed/day) ^a of salt
Infants <2 yrs	No added salt shall be given	No added salt shall be given	No added salt shall be given
Kindergarten and children 2-3 yrs	<2.7 salt grams/day	<1.1 salt grams/day	<0.5 salt grams/day
Preschool and children 4-6 yrs	<3.2 salt grams/day	<1.3 salt grams/day	<0.6 salt grams/day
Primary, secondary, high school and children 7-18 yrs ^b	<5 salt grams/day	<2 salt grams/day	<1 salt grams/day
Adults	<5 salt grams/day	<2 salt grams/day	<1 salt grams/day

^aIn the case of those who do not have 100% of their daily meals in a public canteen, these amounts will be proportionally allocated based on the percentage of a meal's contribution (e.g. as a guideline, lunch contributing between 25-40% of total food consumption, snacks contributing between 10-20% of the total food consumed during the day). These amounts include both grams of salt added and already present in some foods (e.g. bread).

^bTo provide a more efficient and streamlined meal preparation process, we have combined primary, secondary, high school, and children aged 7-18 years' food requirements, as it is likely that the food for school lunches is cooked together for all these age groups.

Verification

See above TS 12 Verification.

AC 11.2. Offer unsalted and/or low salt foods and beverages

Points are to be proportionally awarded to tenders that meet the following criteria:

1. All age groups, excluding children under 18 years for which the following points are included as a technical specification above:
 - a) Salt is not freely available for adding to already prepared food.
 - b) Only offer unsalted nuts and seeds.
 - c) Foods containing more than 1g of salt per 100g of food (e.g. some ready to eat foods, cheeses, processed meats and processed fishery and aquaculture products) are not offered.
2. All age groups, except for infants under 3 years, for which bread shall be unsalted or low in salt as detailed in TS 13.2:
 - a) Only bread with less than 0.7 gram of salt per 100 grams is provided.
3. Children above 6 years:

Food prepared for children above 6 years does not contain added salt.

Verification

See above TS 12 Verification.

6.2.2 Fat

Rationale: Fats are essential components of a balanced diet, but their type and quantity play a critical role in their impact on health. According to WHO, to prevent unhealthy weight gain, total fat intake should not exceed 30% of total energy consumption. To reduce the risk of CVD, SFA consumption should be less than 10% of total energy intake, and trans-fat intake should be less than 1% of total energy intake. It is also recommended to shift fat consumption away from saturated fats and trans-fats towards unsaturated fats, with the goal of eliminating industrially produced trans-fats (EFSA, 2010). Moreover, EFSA recommends that intakes of SFA and trans fatty acids should be as low as possible within a nutritionally adequate diet. In the EU, the maximum limit of trans-fat, other than trans-fat naturally occurring in fat of animal origin, in food which is intended for the final consumer and food intended for supply to retail, should be of 2 grams per 100 grams of fat (European Commission, 2024b).

Objective: The objective of the technical specification and award criteria below is to ensure a balanced intake of fats by limiting SFA and encouraging the intake of healthy fats (i.e. monounsaturated and polyunsaturated fats). Criteria for trans-fats are not presented as they are already regulated in EU law.

TS 14. Monitoring fat content in foods and beverages offered

TS 14.1. The tenderer shall ensure that the calculated total fat content in standard recipes does not exceed 30% of the total energy of the entire menu offered throughout the catering day (WHO, 2020).

TS 14.2. The tenderer shall ensure the following specific goals for each fat type:

1. Saturated Fatty Acids: The total SFA shall account for less than 10% of the total energy of the entire menu offered throughout the catering day (WHO, 2020).
2. Monounsaturated and Polyunsaturated Fats: Unsaturated fats shall be prioritised
 - a) High quality vegetable oils, such as sunflower, soybean, canola (rapeseed) and olive oils, shall be used for cooking and food processing. High smoke point oils, which are oils that begin to smoke at higher temperatures, such as rapeseed oil and sunflower oil, shall be used for cooking (WCRF, 2025).
 - b) Avoid the use of highly saturated vegetable oils and fats such as palm and coconut oils.
 - c) A portion of nuts and/or seeds (20-30 grams) shall be offered on at least 40% of the catering days (e.g. twice in a span of 5 catering days).
 - d) Children under 5 years of age: whole nuts and peanuts shall not be provided in settings aimed at children under 5 years of age due to choking risk. Nuts shall only be offered to this age group in crushed, ground, or smooth forms (e.g. nut butters) (Health Service Executive, nd). Nut butter shall be spread thinly and evenly to reduce choking risk.
3. Deep-fried products shall not be offered to children under the age of 18 years. For other age groups, deep-fried products shall not be offered more than twice weekly. These food items shall only be offered if explicitly deemed appropriate by the FBDGs of the Member State, and age-specific portion sizes shall be provided in accordance with FBDGs.
4. Hardened vegetable fats (e.g. hard margarines), butter and butter-based spreads shall be replaced with high-quality vegetable oils such as sunflower, soybean, canola (rapeseed), and olive oils (ideally virgin or extra-virgin olive oil). Due to the high variation in recommendations from different MS on soft margarines, TS for soft margarines shall be determined based on the FBDGs of each MS (EC, 2025c).

Verification

At the time of bid submission, the tenderer shall provide a representative selection of menus with recipes, culinary techniques, oil types, and energy values for all dishes, including desserts (EC, 2025d).

AC 12. Fat is used consciously

Points are to be proportionally awarded to tenders that meet the following criteria:

1. For children above 3 years and adults: Low-fat/semi-skimmed dairy products (e.g. milk and yogurt: <2% fat; cheese <15% fat) are included in the menu, instead of high-fat/full-fat options (these criteria may necessitate further adaptation based on national FBDGs).
2. Meat and cold cuts: <10% of the total energy of the products comes from SFA.
3. Low fat cooking methods are used (e.g. steaming, baking, stewing).

Verification

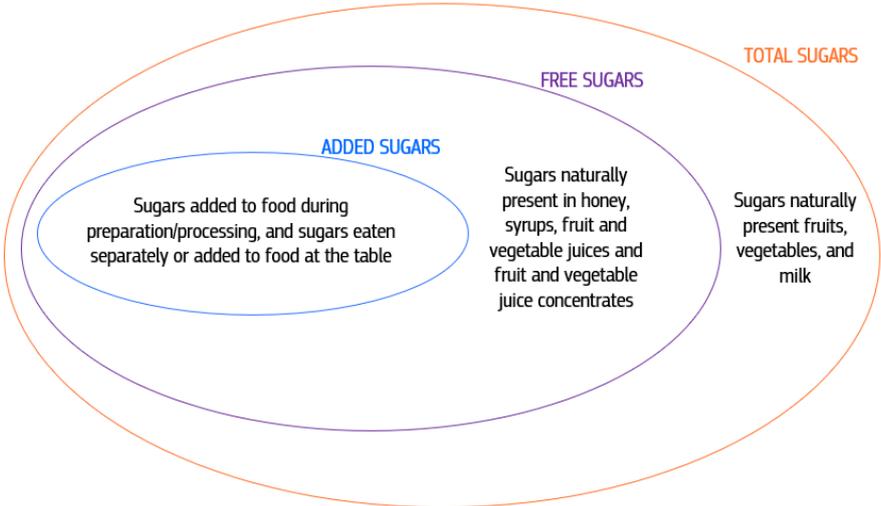
See above TS 14 Verification.

6.2.3 Free sugars and other sweetening agents

Rationale: Free sugars include monosaccharides and disaccharides added to foods and beverages by the manufacturer, cook or consumer, and sugars naturally present in honey, syrups, fruit juices (which by definition does not contain added sugars) and fruit juice concentrates (WHO, 2015a; Council of the European Union 2025a; Council of the European Union 2025b, EFSA 2022a). High intakes of

free sugars contribute to the overall energy density of diets, which can lead to unhealthy weight gain, increased risk of obesity, and various non-communicable diseases (NCDs), especially dental caries, the most prevalent NCD globally (WHO, 2023d). Added sugars include all mono- and disaccharides used as sweetening ingredients, including sugars in honey, syrups, fruit and vegetable juices, and fruit and vegetable juice concentrates that are added to foods (EFSA 2022b).

Figure 3. Illustration of added free and total sugars (adapted by EFSA).



Source: EFSA (2022b).

EFSA states that the intake of free sugars should be as low as possible in a nutritionally adequate diet, as an upper safe intake level of intake that prevents increased risks of dental caries and chronic metabolic diseases has not been identified (EFSA, 2022a, 2022b).

WHO recommends reducing the intake of free sugars to less than 10% of total energy intake, while further suggesting an additional reduction of free sugars intake below 5% of total energy intake for additional health benefits (WHO, 2023b). Nowadays in Europe, both children and adults consume >10% of their total energy intake from free sugars (European Commission, 2023e).

In children under 2 years, foods and beverages with free sugars should be avoided (Nordic Council of Ministers, 2023). For children over two years of age, there is a consensus that the consumption of free sugars should be as low as possible, while there is no agreement on a specific maximum amount, if any (WHO, 2015a; EFSA, 2019).

In the EU, sweeteners are defined as food additive substances used to 'impart a sweet taste to foods or in table-top sweeteners' (Council of the European Union, 2008). Non-sugar sweeteners are low- or no-calorie alternatives to free sugars (WHO 2023f). WHO states that non-sugar sweeteners in foods and beverages should not be used as a means of achieving weight control or reducing the risk of NCD (WHO 2023f). WHO also highlights that they are not essential dietary factors and have no nutritional value, and that people should reduce the sweetness of the diet altogether, starting early in life, to improve their health (WHO 2023g). They also recommend that the preferred alternatives to foods and beverages containing free sugars should be sources of naturally occurring sweetness, such as fruits (WHO 2023f). Recommendations for implementing this "free sugars and other sweetening agents" criteria can be found in section 6.2.3.

Recommendations for implementing these “free sugars and other sweetening agents” criteria can be found in section 6.2.10.

Objective: The objective of the technical specification and award criteria below is to ensure that free sugars⁶⁰ and non-sugar sweeteners in foods and beverages are limited.

TS 15. Limiting free sugars and other sweeteners in menus

TS 15.1. Provide menus with age-specific free sugar content

The tenderer shall ensure:

1. Infants and children under 3 years:
 - a) Infants and young children under 3 years: Foods and beverages with free sugars (e.g. flavoured yogurts, fruit juices, jam, honey) shall not be offered..
2. Children under 18 years old:
 - a) Sugar, honey and other sweeteners, shall not be freely available for adding to already prepared food.
 - b) All nuts and seeds offered shall be without sugar or sugary coatings.
 - c) In case the water service is provided by the tenderer, only water is offered as a beverage for quenching thirst.
3. Children 3-18 years old: Free sugars account for less than 5% of the total energy content of the entire menu offered throughout the catering day (WHO, 2020).
4. For all settings, except for those catering to children under 18 years old (for which a different TS is provided above), the tenderer shall ensure that free sugars account for less than 10% of the total energy content of the entire menu offered throughout the catering day (WHO, 2020).

TS. 15.2. Non-sugar sweeteners

Non-sugar sweeteners (e.g. artificial sweeteners), which are low- or no-calorie alternatives to free sugars, and food and beverages containing non-sugar sweeteners, shall not be provided to children under 18 years old (WHO, 2023c).

Verification

At the time of bid submission, the tenderer shall provide a representative selection of menus with recipes including clear and detailed information on free sugars content.

TS 16. Reduce consumption of sugar sweetened beverages⁶¹

The tenderer shall ensure that:

1. Children under 18 years old: non-alcoholic beverages with free sugars are not provided for sale or offered as part of meal options.

Verification

See above TS 15.

⁶⁰ Free sugars include monosaccharides and disaccharides added to foods and beverages by the manufacturer, cook or consumer, and sugars naturally present in honey, syrups, fruit juices and fruit juice concentrates. <https://www.who.int/publications/i/item/9789241549028>.

⁶¹ Sugar sweetened beverages are non-alcoholic beverages containing sugars and comprise a broad range of beverages including carbonated soft drinks, juices and nectars, flavoured milks and other dairy drinkable products, sweetened plant-based drinks, energy drinks, vitamin waters, sweetened iced teas and concentrates (WHO 2022c).

AC 13. Limiting free sugars and other sweeteners in menus

Points will be proportionally awarded to tenders based on the following criteria (applies to all age groups, except those for which a conflicting criterion has been stated above in TS 15-16):

1. Free sugars account for less than 5% of the total energy content of the meal.
2. Sugar, honey and other sweeteners, including non-sugar sweeteners, are not freely available for adding to already prepared food.
3. All nuts and seeds offered are without sugar or sugary coatings.
4. Non-sugar sweeteners and food and beverages containing non-sugar sweeteners are not provided.
5. Provide plain yogurt instead of low-sugar or flavoured yogurts.

Verification

See above TS 15.

AC 14. Reduce consumption of sugar sweetened beverages

Points will be proportionally awarded to tenders based on the following criteria (applies to all age groups, except those for which a conflicting criterion has been stated above in TS 15-16):

1. In case the water service is provided by the tenderer, only water is offered as a beverage for quenching thirst in any setting.
2. Non-alcoholic beverages available for sale or offered in meals do not exceed 5% of the total energy content of free sugars.

Verification

See above TS 15.

6.2.4 Preferred food sources for carbohydrates

Rationale: A substantial portion of total calorie intake should consist of carbohydrates, primarily derived from minimally processed whole grains, vegetables, fruits, legumes, and nuts and seeds, as research indicates that these foods are linked to a lower risk of mortality from various causes and diet-related non-communicable diseases (e.g. type 2 diabetes, CVD), while consumption of these foods ensures an adequate intake of dietary fibre (WHO, 2020).

Overall, EU citizens do not consume the recommended 5 portions a day of fruits and vegetables (European Commission, 2023b), and the majority of children do not consume fruits and vegetables daily (WHO, 2022a).

Objective: The objective of the technical specification and award criteria below is to ensure a sufficient intake of high-quality carbohydrates, primarily to guarantee an adequate intake of dietary fibre. It should be noted that the offering of nuts and seeds are already covered within the salt, fat and free sugar sections above.

TS 17. Whole grains

The tenderer shall ensure that:

1. Grains and grain products shall be offered in whole-grain form on at least half of the catering days.
2. Whole-grain bread (at least 90% of whole-grain) shall be the sole bread option provided on at least half of the catering days (European Commission, 2023d). If needed, the proposed percentage of whole grain may be adapted based on the FBDGs from each MS.

Verification

At the time of bid submission, the tenderer shall provide relevant documentation on how this will be done, including for example documentation showing a representative selection of recipes and menus.

TS 18. Fruits and vegetables

The tenderer shall ensure that:

1. A variety of fresh vegetables and fruits are offered daily.
2. A portion of fruit shall be sold at a lower price than a portion of hot or cold dessert.
3. Only whole fruits, not fruit juices, are considered a portion of fruit.
4. Half day catering (includes up to afternoon snack):
 - a) Cooked and raw vegetables and salad shall be served daily at lunch either as a main dish or as a side dish option.
 - b) Fruits shall be served daily, either at lunch or as a snack.
5. 24h catering (includes all meals consumed throughout the day):
Offer a minimum of 5 portions of fruits and vegetables daily.
6. Children under 5 years of age: Small fruits and vegetables (e.g. grapes, cherry tomatoes, berries) and hard fruits and vegetables (e.g. carrots, celery, apples) shall not be provided in their whole, raw form to children under 5 years of age. These items must be prepared to reduce choking risk by, for example, cutting them into halves or smaller pieces lengthways, grating, or finely chopping, as appropriate (Health Service Executive, nd).

Verification

See above TS 17

TS 19. Pulses

1. A variety of pulses shall be provided.
2. As a main dish:
 - a) Half day catering: Pulses shall be offered on at least 20% of the catering days (e.g. once in a span of 5 catering days).
 - b) 24h catering: Pulses shall be offered on at least 40% of the catering days (e.g. twice in a span of 5 catering days).
3. As a side dish option:
 - a) When multiple side dishes are available, pulses shall be offered on at least 60% of the catering days.
 - b) When only one side dish is offered, pulses shall be provided on at least 20% of the catering days (e.g. 1 out of 5 catering days).

Verification

See above TS 17.

TS 20. Tubers or starchy vegetables⁶²

The tenderer shall ensure the following:

Amount:

The tenderer shall ensure that when multiple side dishes are available, starchy vegetables are offered as a side dish at lunch or dinner daily, providing a maximum of 50 grams per day.

Cooking methods:

1. Children under 18 years old: Deep frying shall not be used for cooking starchy vegetables, and boiling or baking without added salt shall be used instead.
2. For other age groups, the preferred cooking method for starchy vegetables 90% of the time shall be mainly boiling or baking without added salt.

Verification

See above TS 17.

AC 15. Increase the offer of high-quality carbohydrates

Points are to be proportionally awarded to tenders that meet the following criteria:

1. Whole grains
 - a. Grains and grain products are offered in whole-grain form 80% of the catering days.
 - b. Whole-grain bread is the sole bread option provided daily.
2. Fruits and vegetables
 - a. Fruit is offered daily in every snack and as a dessert.
 - b. Vegetables are offered as a main dish daily.
3. Pulses
 - a. As a main dish:
 - Half day catering: Pulses are offered on at least 60% of the catering days.
 - 24h catering: Pulses are offered on at least 80% of the catering days.
 - b. Pulses are offered in every meal as a side dish option.

Verification

See above TS 17.

AC 16. Fresh fruits, vegetables and pulses

Points are to be proportionally awarded to tenders that meet the following criteria:

1. Prioritise fresh, fruits and vegetables in the menu. Frozen, canned, and packaged fruits and vegetables are used only when fresh options are unavailable or impractical.
2. Avoid adding sugar and salt to fruits, vegetables and pulses during preparation or cooking.

Verification

See above TS 17.

AC 17. Nutrient-preserving cooking methods

Points are to be proportionally awarded to tenders that meet the following criteria:

1. Use cooking methods that preserve nutrients, such as steaming and roasting.
2. Low-fat cooking methods, such as steaming and roasting, are used instead of frying and deep-frying for cooking vegetables.

⁶² Tubers or starchy vegetables are not considered high-quality carbohydrates, but they contribute fibre, essential nutrients, and have a low environmental impact (Nordic Council of Ministers., 2023 and Nuutila et al., 2019)

Verification

At the time of bid submission, the tenderer shall provide a representative selection of menus and production sheets for the use of nutrient-preserving cooking methods and low-fat cooking options (e.g. steaming, roasting).

6.2.5 Meat

Rationale: Red meat refers to all mammalian muscle meat, including, beef, veal, pork, lamb, mutton, horse, and goat. Processed meat refers to meat that has been transformed through salting, curing, fermentation, smoking, or other processes to enhance flavour or improve preservation. Most processed meats contain pork or beef, but processed meats may also contain other red meats, poultry, offal, or meat by-products such as blood. Examples of processed meat include hot dogs (frankfurters), ham, dried and cooked sausages, corned beef, and biltong or beef jerky as well as canned meat and meat-based preparations and sauces (WHO, 2015b).

Although red meat provides high-quality protein, vitamins and minerals (particularly iron and vitamin B12), it can be a major source of SFAs and excess consumption has been associated with higher risks of colorectal cancer, type 2 diabetes and CVD (WHO, 2023e). Moreover, the method of preparing and processing meat, such as high-temperature cooking (e.g. grilling, frying, deep frying, and barbecuing), is associated with increased disease risk due to the production of elevated levels of potentially harmful compounds (WHO, 2015b). For these reasons, most FBDGs recommend limiting the intake of red and processed meat, although the recommended amount of meat consumption in the EU varies (European Commission, 2025b).

Objective: The objective of the technical specification and award criteria below is to balance meat content in public procurement with nutritional and health recommendations while accounting for environmental impact.

TS 21. Red meat

The tenderer shall limit the amount of red meat served per week; the number of servings or grams of meat provided per week shall be determined based on the FBDGs from each MS (European Commission, 2025b). If the canteen does not serve 100% of the daily meals, the red meat allocation will be proportionally reduced based on the percentage of meals served. For example, if the canteen serves 50% of the daily meals, the red meat allocation will be reduced by 50% compared to the full daily meal allocation.

Verification

At the time of bid submission, the tenderer shall provide relevant documentation on how this will be done, including for example documentation showing a representative selection of recipes and menus, as well as how national FBDGs will be implemented to determine the amount of red meat served weekly.

TS 22. White meat

The number of servings or grams of white meat provided per week shall be determined based on the FBDGs from each MS.

Verification

See above TS 21.

TS 23. Processed meat

The tenderer shall ensure that processed meat:

1. As a main meal (e.g. sausage, hamburgers, unless made from fresh, untreated minced meat only, with clear demonstration of compliance) is offered no more than X times per week or month; the number of servings per week or month will be determined in accordance with the FBDGs from each MS. Proportional reduction shall be applied if the canteen serves less than 100% of daily meals.
2. Dishes containing processed meat, provided that these do not contribute more than 25% of the dish, can be offered a maximum of twice a week. Proportional reduction shall be applied if the canteen serves less than 100% of daily meals.
3. Processed meat shall only be offered if explicitly deemed appropriate by the FBDGs of the Member State, and age-specific portion sizes shall be provided in accordance with FBDGs.

Verification

See above TS 21.

AC 18. Red and processed meat

Points are to be proportionally awarded to tenders that meet the following criteria:

1. Red meat is offered no more than once weekly in half day catering services and no more than twice in 24-hour catering services.
2. Processed meat is offered no more than once every two weeks in both half day and 24-hour catering services, including processed meat that is not the main component of a meal and is part of other dishes.

AC 19. Meat management

Points are to be proportionally awarded to tenders that meet the following criteria:

1. Utilise low-temperature cooking methods, avoiding high-temperature cooking methods, such as grilling and pan-frying, to minimise the production of potentially hazardous compounds like heterocyclic amines and polycyclic aromatic hydrocarbons.
2. Pre-trim visible fat before cooking to decrease the intake of saturated fats.
3. Provide only poultry without skin.
4. Except in cases where chewing difficulties are a concern (e.g. older adults or individuals with health issues affecting mastication), meat options with a visible meat structure, such as steaks or whole cuts, are preferred over minced or ground meat, which generally have a higher percentage of saturated fat.

Verification

See above TS 21.

6.2.6 Fishery and aquaculture products

Rationale: The consumption of fishery and aquaculture products provides energy, protein and other important nutrients, including the long-chain n-3 polyunsaturated fatty acids, particularly present in oily fish (e.g. anchovies, herring, mackerel, salmon, sardines). Its consumption has been associated with a lower risk of multiple health outcomes, such as CVD and neurological diseases. However, there are potential risks from contaminants such as mercury, dioxins and microplastics. Choosing low-contaminant species can maximise benefits while minimizing risks, especially for vulnerable groups (WHO, 2021b).

Objective: The objective of the technical specification and award criteria below is to ensure sufficient weekly servings of appropriate fishery and aquaculture products types.

TS 24. Adequate amount of appropriate fishery and aquaculture products and preparations

The tenderer shall ensure that:

1. A variety of fishery and aquaculture products are offered.
2. Amount provided weekly:
 - a) Half day catering: a minimum of 1 fishery and aquaculture products portion per week, with oily fish (see examples in the background section above), offered every other week.
 - b) 24h catering: offer a minimum of 2 fishery and aquaculture products portions per week, with at least one being an oily fish option.
3. Infants and children under 6 years: Smoked fishery and aquaculture products are not offered.

Verification

At the time of bid submission, the tenderer shall provide relevant documentation on how this will be done, including for example documentation showing a representative selection of recipes and menus.

AC 20. Recommended amounts and cooking of fishery and aquaculture products

Points are to be proportionally awarded to tenders that meet the following criteria:

1. Exclude smoked fishery and aquaculture products from the offerings.

Verification

See above TS 24.

6.2.7 Dairy products

Rationale: Milk and other dairy products are major sources of protein and micronutrients such as calcium, iodine, and vitamin B12. Some evidence shows that fermented and low-fat dairy may be linked to a lower risk of CVD. Dairy products have also been related to a lower risk of colorectal cancer. However, high intake of full-fat milk may contribute to a higher risk of CVD (Nordic Council of Ministers, 2023).

Objective: The objective of the technical specification and award criteria below is to ensure adequate servings of milk and dairy products in public procurement. It should be noted that aspects of milk and dairy products related to salt (6.2.1), fat (6.2.2) and free sugar (6.2.3), including for example flavoured yogurt are already covered in the corresponding sections above.

TS 25. Adequate amount of milk and other dairy products

The tenderer shall ensure the following amounts of milk and dairy products:

- Half day catering: A portion of milk or other dairy products (ideally plain yogurt) shall be offered daily at breakfast, as a snack, or as a dessert.
- 24h catering: milk or other dairy products (ideally plain yogurt) are offered twice a day.

Verification

At the time of bid submission, the tenderer shall provide relevant documentation on how this will be done, including for example documentation showing a representative selection of recipes and menus.

AC 21. Reduce cheese consumption

Points are to be proportionally awarded to tenders that meet the following criteria:

1. Adapt existing recipes: Modify existing recipes to decrease cheese usage or replace it with healthier alternative ingredients, such as nut-based sauces.
2. Portion control: Carefully measure cheese portions and serve smaller amounts in dishes, ensuring they contain less cheese overall.
3. Optional cheese add-ons: Offer cheese as an optional topping for dishes that typically contain cheese, allowing diners to add cheese to their taste while controlling the portion size.

Verification

See above TS 25.

6.2.8 Alcohol

Rationale: Alcohol consumption is a risk factor for various illnesses and overall premature mortality, leading to a wide range of injuries and diseases (European Commission, 2017). Ethanol,

the primary alcohol in alcoholic beverages, is a toxic and addictive substance classified as carcinogenic to humans, which increases cancer risk (WHO, 2024). Certain groups, such as children and adolescents, should abstain completely from alcohol, while some medications may interact with alcohol, affecting their efficacy. One of the World Health Organisation's (WHO) "best buys" (most effective and cost-effective interventions) to reduce alcohol-related harm includes strengthening alcohol availability restrictions. Public procurement can eliminate alcohol availability in educational and healthcare settings and certain workplaces, reducing overall alcohol accessibility and mitigating alcohol-related harm (IARC, 2010).

Objective: The objective of the technical specification and award criteria below is to ensure that alcohol is not available in certain settings, such as educational and clinical settings, and that they are offered cautiously in other settings.

TS 26. Alcohol use for meal preparation
Alcohol shall not be used for meal preparations in meals aimed at those <18 years of age, and the use of alcohol for meal preparation shall be minimal or avoided altogether for meals aimed at adults. If alcohol is used in meal preparation for adults, it must be clearly stated in the menu or by other appropriate, clearly visible means.
<p>Verification</p> <p>At the time of bid submission, the tenderer shall provide a written commitment stating that alcoholic drinks will not be used for meal preparation in meals aimed at those <18 years, and that the use of alcohol for meal preparation shall be minimal or avoided altogether for meals aimed at adults.</p>
TS 27. Access to alcohol in different settings
<p>The tenderer shall ensure that</p> <ol style="list-style-type: none"> 1. alcoholic drinks are not available in educational and clinical settings. 2. In settings where alcoholic beverages are available for adult consumption, apart from educational or clinical environments: <ol style="list-style-type: none"> a) Alcoholic drinks shall be stored separately from other goods and shall not be prominently displayed. b) Alcoholic beverages shall only be served in containers containing a maximum 10g of pure alcohol, which corresponds for example to approximately 250-330 ml of beer or 100-125 ml of wine, depending on the alcoholic strength.
<p>Verification</p> <p>At the time of bid submission, the tenderer shall provide a written commitment stating that alcoholic drinks will not be available in these settings, outlining their plan to monitor compliance. When applicable, it should provide information on how alcoholic drinks will be stored and the quantities planned per serving.</p>

AC 22. Limitation of alcoholic drinks
Points will be awarded to tenders that: <ul style="list-style-type: none"> — Do not make alcoholic drinks available in any setting.
<p>Verification</p> <p>See above TS 26 and 27. The tenderer shall provide a written commitment stating that alcohol will not be available in any settings.</p>

6.2.9 Criteria for packaged and ready-to-eat foods

The technical specifications outlined in chapter 6.2.'s general nutritional criteria for foods, together with criteria on vending machines (chapter 5), applies to all food and beverages procured, including pre-packaged, ready-to-eat items and those requiring minimal preparation, such as heat-and-serve meals, soups, or frozen entrees. In order to provide additional support for procurers, these technical specifications are summarised in table 19 and table 20 and specific considerations for packaged, ready-to-eat, or partially prepared food products are outlined below.

Table 19. Summary of technical specifications for foods and beverages procured.

Food and beverages	Age group			
	< 3 years	3-6 years	6-18 years	>18 years
Bread	Unsalted or low-salt 0.3g salt/100g)	< 1g salt /100g	< 1g salt /100g	< 1g salt /100g
Nuts and seeds	Unsalted, unsweetened	Unsalted, unsweetened	Unsalted, unsweetened	
Cheese, flavoured and savoury dairy products and processed meats and fishery and aquaculture products*	If >0.3g salt/100g the portions shall not exceed 25g	If >0.3g salt/100g the portions shall not exceed 25g	If >1g salt/100g the portions shall not exceed 25g	

* These food items shall only be offered if explicitly deemed appropriate for each age group by the FBDGs of the Member State, and age-specific portion sizes should be provided in accordance with FBDGs.

Source: Authors' own elaboration.

TS 28. Bakery products, savoury products and breakfast cereals

This category includes various items such as cakes, pastries, cookies, muffins, breakfast cereals and other sweet or savoury baked goods.

TS 28.1. Infants and children (0 to 6 years old):

The tenderer shall ensure that:

1. Infants and young children under 3 years: Only packaged, ready-to-eat and partially prepared food low in sodium/salt (maximum 0.3 grams of salt per 100 grams) and without free sugars shall be offered.
2. Children 3 to 6 years: Only packaged, ready-to-eat and partially prepared food low in sodium/salt (maximum 0.3 grams of salt per 100 grams) and sugar (5 g of total sugars per 100 g for solids or 2,5 g of total sugars per 100 ml for liquids) can be offered. This sugar limit shall not apply to dairy products without added sugar, fruits and vegetables.
3. Saturated fat: A low in saturated fat (1,5 g per 100 g) version shall be procured.
4. Fibre: Breakfast cereals shall be high in fibre (that is, at least 6g/100g), or at least 50% are wholegrain varieties.

TS 28.2. Criteria by nutrient of concern

The following TS apply to settings involving individuals aged 6 years and older, including adults.

1. Salt:
 - a. At least 75% of bakery products procured by volume, and 75% of breakfast cereals are low salt varieties (maximum 0.3 grams of salt per 100 grams).
 - b. Savoury snacks (i.e. crisps and any product made from small pieces of potato, wheat, rice, corn or other base ingredient, which have been baked, extruded, cooked in any way) are only provided in sizes of 35g or less and salt shall be restricted to <1 g/100g.
2. Saturated fat: where available, a low in saturated fat (1.5 g per 100 g) version shall be procured.
3. Free sugars:
 - a. At least 75% of breakfast cereals and bakery products provided shall not exceed 5g/100g total sugars (10g additional allowance for dried fruit in cereals).
 - b. The other 25% of breakfast cereals and bakery products provided shall not exceed 10g/100g total sugars (10g additional allowance for dried fruit in cereal).
4. Calories: At least 75% of bakery products, confectionery and packet sweet snacks provided are in the smallest standard single serve portion size available within the market and they cannot be sold together as a bundle (e.g. wrapped or combined packs). The individual packs shall not exceed the following calorie limit:
 - a. Biscuits - 100kcal
 - b. Cakes - 200 kcal
 - c. Morning goods (e.g. croissants, muffins, pancakes) - 200 kcal
 - d. Chocolate and chocolate bars - 200 Kcal
 - e. Sugar confectionery - 125 Kcal
 - f. Other foods - 200 kcal
5. There is at least one day a week when products with free sugars are not offered ("sugar-free day(s)").
6. Fibre: Breakfast cereals shall be high in fibre (that is, at least 6g/100g), or at least 50% are wholegrain varieties.

Verification

At the time of bid submission, the tenderer shall provide relevant documentation, such as a representative selection of product specifications and labels, together with a written commitment stating the above TS will be met and outlining their plan to monitor compliance.

TS 29. Non-alcoholic beverages

The following TS apply to settings involving individuals above 18 years old:

1. The offer of SSBs shall be limited. If SSBs are offered, it should be ensured that an equal proportion of at least 50% low-calorie options are available. No more than 10% non-alcoholic beverages provided can be sugar sweetened beverages (SSB, definition of SSB included in section 6.2.3).
2. All SSB to be no more than 330ml pack size or serving.
3. Any meal deals shall not include any SSB.
4. Fruit juice, vegetable juice and smoothies to be provided in single serve packs. When these products are prepared in-house, the maximum portion size shall be 200 ml.
5. Vegetable drinks (e.g. soya-, almond-, oat-based) shall also comply with all other relevant technical specifications, including for example, limits on free sugars or the absence of non-sugar sweeteners in settings involving individuals under 18 years.

Verification

See above TS 28.

TS 30. Other foods procured

The tenderer shall ensure that:

1. Meat and meat products procured by volume be lower in saturated fat (1,5 g per 100 g), where available.
2. At least 75% of meat products, soups, and ready meals procured by volume, and 75% of pre-packed sandwiches provide less than 0.6g salt/100g of food).
3. Ready to eat vegetable salads:
 - a. Shall be made from fresh vegetables and shall not have added salt.
 - b. Salad dressings shall be made of high-quality vegetable oils (see fats section above for further details) and shall have <2 grams of added sugar per serving.
4. Ready to eat fruit and vegetable salads: Shall be made from fresh fruits and vegetables and shall not have added sugar or sweeteners.

Verification

See above TS 28.

AC 23. Criteria for packaged and ready-to-eat foods

Points are to be proportionally awarded to tenders that meet the following criteria:

1. Children under 6 years:
 - a. Ready-to-eat meals are not offered.
 - b. Only packaged and partially prepared food without free sugars are offered.
 - c. Only ready to eat foods low in sodium/salt (maximum 0.3 grams of salt (0.12 grams of sodium) per 100 grams) are provided.
2. Salt:
 - a. All bakery products procured by volume and breakfast cereals are low salt varieties.
 - b. Savoury snacks: salt is restricted to <0.5 g/100g.
3. Free sugars: All breakfast cereals and bakery products provided not exceed 10g/100g total sugars (10g additional allowance for dried fruit in cereal).
4. Calories: All bakery products, confectionery and packet sweet snacks provided are in the smallest standard single serve portion size available within the market and do not exceed 100 kcal.
5. There are 2 or more days per week when products with free sugars are not offered ("sugar-free day(s)").
6. No more than 10% of the non-alcoholic beverages provided can be sugar sweetened beverages

Verification

See above TS 28.

Table 20. Better choices for sandwiches and wraps, technical specifications, and award criteria¹.

Nutrient or food group of concern	Better choices for sandwiches and wraps		Technical specification	Award criteria
	Replace...	With...		
Refined carbohydrates and low fibre	White bread	Whole grain bread	To use croissant instead of bread is not allowed At least 50% sandwiches contain wholemeal bread	At least 75% sandwiches contain wholemeal bread
Saturated fats	Processed meats Full-fat cheeses Butter/hard margarine/mayonnaise used as spreads	Lean unprocessed meat without skin (e.g. turkey, chicken) Vegetables (e.g. tomato, lettuce, cucumber) Plant-based proteins (e.g. Hummus, beans) Low-fat cheese Hummus	At least 50% of sandwiches contain the following per serving: 1. <400kcal 2. <5.0g saturated fat per 100g 3. Do not contain processed meats	At least 75% of sandwiches contain the following per serving: 1. <400kcal 2. <5.0g saturated fat per 100g 3. Do not contain processed meats Only low-fat cheese is included
Salt	Processed meats Cheeses Condiments (mustard, mayo) Bread high in salt	Unprocessed and cooked meats Vegetables Plant-based proteins Low-salt breads	75% sandwiches contain a maximum of 2 grams of salt per serving ²	75% sandwiches contain a maximum of 1.5 grams of salt per serving ²
Added sugars	Condiments (e.g. ketchup, barbecue sauce) and breads	Use sugar-free or low-sugar condiments and avoid sweetened breads	50% sandwiches contain unsweetened bread and use low-sugar or sugar-free condiments ²	75% sandwiches contain unsweetened bread and use low-sugar or sugar-free condiments ²

¹ Examples include standard sliced bread, baguette, roll, ciabatta, focaccia, and soft wraps.

² These criteria do not apply to children <6 years in order to meet the already established technical specifications above.

Source: Authors' own elaboration.

6.2.10 Recommendations for implementing the nutritional criteria

This section provides guidance on the implementation of the nutritional criteria presented above. It is important to note that in those settings where the current offer of salt and free sugars is higher than what it is included in the technical specification, a gradual transition during a determined period of time (e.g. to decrease the amount of free sugars in the menu a determined percentage every 2 months until the maximum target is met during a 6 month or a year period) is recommended for better acceptability. It is recommended that the period of compliance is extended for 1.5 years, allowing a total implementation for salt and sugar standards.

Total sugars include added, free and those naturally present in foods (such as lactose in plain yogurt or sugars contained within the cellular structure of intact fruits and vegetables). For the criteria on free sugars above to be implemented, it is important to be able to determine the amount of free sugars in menus and foods (i.e. monosaccharides and disaccharides added to foods and beverages by the manufacturer, cook or consumer, and sugars naturally present in honey, syrups, fruit juices and fruit juice concentrates). An example of how to determine free sugars can be

found in Annex B of the following EFSA article (EFSA 2022b), which may be useful for nutrition and/or dietetics experts designing the menus. Moreover, recommendations for implementing the “free sugars and other sweetening agents” can be found in Table 22.

A brief summary of dietary changes that would help implement the nutritional criteria, including which foods to increase, limit, and examples of better choices, can be found in table 21.

Table 21. Dietary changes that would help implement the nutritional criteria.

Increase	Limit	Examples of better choices	
		Replace...	With...
Vegetables: consider using them in pies, pancakes and sandwiches	Processed meat Red meat	Refined cereals, including bread	Whole grain products (90% of the grains are whole grains)
Fresh fruits	Non-alcoholic beverages with free sugars (i.e. SSB) and non-sugar sweeteners	Butter and butter-based spreads	High-quality vegetable oils (e.g. sunflower, soybean, canola and olive oils) Low-fat vegetable spreads Pulses pastes and nut spreads without added salt, sugar and fat
Pulses: consider pastes from 100% legumes (e.g. hummus without added salt, fat, and sugar)	Foods with high amounts of added fats, salt, and sugar	High-fat dairy Flavoured dairy products	Skimmed and semi-skimmed dairy Plain yogurt and sugar-free yogurts
Whole grains	Alcohol	Foods rich in saturated fats, salt, and/or sugar	Whole foods and options containing low amounts of these nutrients
Nuts and seeds without added salt, sugar, and fat	Bakery products (high fat, salt, and/or sugar content).	Snacks with high salt, fat, and/or sugar content	Fruit, raw vegetables, unsalted nuts, whole grain bread with healthy toppings (e.g. tomato, nut spread, hummus, low-fat cheese)
Fish, especially oily fish	Ready meals with high salt content, for example soups, instant noodles, pizza, casseroles	Processed meat	Low-fat and lower-salt meat products Lean white meat without skin (e.g. turkey, chicken) Vegetables (e.g. tomato, lettuce, cucumber) Plant-based proteins (e.g. Hummus, beans)
	Sauces, condiments, and dressings (high salt, fat, and/or sugar)		

Source: Authors' own elaboration.

Table 22. Recommendations for implementing the free sugars criteria.

Replace...	With...
Many breakfast cereals, including those aimed at children, have high amounts of free sugars (e.g. frosted flakes, cocoa puffs)	Puffed whole grains (e.g. puffed rice, puffed wheat) or extruded grains (e.g. cornflakes) low in sugar (≤ 5 g total sugars/100 g) or without added sweeteners ¹
Flavoured muesli or granola with honey or syrups	Muesli with whole grains, nuts, and seeds low in sugar (≤ 5 g total sugars/100 g) or without added sweeteners ¹
Flavoured instant oatmeal	Plain rolled oats or steel-cut oats (add fresh fruit for natural sweetness)
Sugary snack bars (e.g. cereal bars, granola bars)	Energy bars with oats, nuts, seeds, low in sugar (≤ 5 g total sugars/100 g) or without added sweeteners ¹
Pastries, cakes, and breakfast/snack foods (e.g. croissants, cookies, muffins, pancakes, biscuits)	Whole grain toast with tomato, high-quality vegetable oils (see examples in “fat” criteria above), hummus, or nut butters without added fat, sugar ¹ and salt
Bread with added sugar	Bread without added sweeteners ¹
Flavoured yogurts, including fruit-flavoured yogurts, dairy desserts, and flavoured milk	Plain yogurt (fresh fruit may be added for natural sweetness or some nuts), plain milk
Sugary spreads (e.g. jam, honey, chocolate spreads)	Nut butters (e.g. peanut butter, almond butter) with no added fat, sweeteners ¹ , and salt
SSB, fruit juices, fruit nectars, fruit drinks	Whole fruit (e.g. apple, orange, berries), water, diluted fruit juice (only for those above 3 years old, e.g. dilute one measure fruit juice to 5 measures water) ² , unsweetened coffee and tea, including herbal or fruit infusions ^{1,2}
Sauces, condiments, and dressings (e.g. ketchup, BBQ sauce)	Low sugar (5 g of sugars/100 g for solids or 2,5 g of sugars/100 ml for liquids) or without added sweeteners ¹ versions
Readymade sauces, including tomato sauce	Low sugar (5 g of sugars/100 g for solids or 2,5 g of sugars/100 ml for liquids) or without added sweeteners ¹ versions
Canned foods with added sugars (e.g. Tinned baked beans)	Low sugar (5 g of sugars/100 g) or without added sweeteners ¹ versions
Chocolate/flavoured drinks with added sugars	Plain milk or plain milk with unsweetened cocoa powder ¹

¹No added sugar and other sweetening agents (i.e. no free sugars and non-sugar sweeteners).

²These food items shall only be offered if explicitly deemed appropriate by the FBDGs of the Member State, including appropriateness for specific age groups; age-specific portion sizes shall be provided in accordance with FBDGs.

Source: Authors' own elaboration.

6.3 Food waste prevention

Rationale: The magnitude of the environmental, social, and economic impacts of food waste confirms its reduction is fundamental to achieve sustainable food systems (Sala et al., 2023). Extensive literature on food waste generation and prevention in public settings, especially schools and universities, exist. However, consistent monitoring and evaluation of interventions implemented is currently lacking (Casonato et al., 2023). Supporting the implementation of this criterion by tenderers and public authorities is instrumental in reaching food waste reduction targets. The existing criterion from EU GPP was reviewed and restructured, by using the most updated information. A recent project launched by the European Parliament (European Consumer Food Waste Forum, ECFWF⁶³) highlighted the importance of applying an evidence-based and targeted approach to reducing food waste, including in food service environments. An award criterion is therefore proposed to invite food services to actively participate and pilot actions to reduce food waste.

Objective: Support food waste reduction. SDG 12.3 targets a reduction of 50% in food wasted at consumption level (including food services) by 2030. To accelerate progress toward food waste targets set in the context of the Revised Waste Framework Directive⁶⁴, coordinated action is key to ensure targets are met by 2030, including in public procurement.

Table 23. Gaps and proposed actions in food waste prevention

Gaps identified from the technical analysis	Proposed action
<ul style="list-style-type: none"> — The current EU GPP criteria provide an extensive list of possible actions to prevent food waste without a clear prioritisation or guidance on which one to choose. — Consumer level interventions in food services could also be implemented. 	<p>For the TS:</p> <ul style="list-style-type: none"> — Align as much as possible the Target – Measure - Act Approach (Champions 12.3, 2020), possibly inviting contracting authorities and public administrations to set targets for reduction. — Encourage the setting of targets from contracting authorities. <p>For the AC:</p> <ul style="list-style-type: none"> — Introduce an AC for innovative approaches piloted in food services. <p>Further actions to be considered beyond the scope of this report:</p> <ul style="list-style-type: none"> — Provide guidance on the methods to be used to conduct monitoring of food waste and indicators. — Update criterion with most updated information, like the outputs from the European Consumer Food Waste Forum.

⁶³ https://knowledge4policy.ec.europa.eu/projects-activities/european-consumer-food-waste-forum_en#latest-knowledge

⁶⁴ https://environment.ec.europa.eu/topics/waste-and-recycling/waste-framework-directive_en

TS 31. Food waste prevention

The tenderer shall commit to the prevention of food waste during acquisition, storage, meal preparation, serving and consumption (when possible). This technical specification is articulated in three parts: monitoring, action and waste management.

1. Monitoring

The tenderer will carry out **routine monitoring** of food waste and follow appropriate accounting methodologies.

The monitoring will consist of:

- Setting a baseline measurement of food waste for each season. The baseline measurement shall last at least a week of operation of the food service.
- Routine monitoring: at least twice a year for the duration of the contract.

The monitoring shall try to account for external factors such as holidays or major events. The monitoring will survey all processes under the scope of the contract (from product acquisition to waste management) and identify types and sources of waste generation, including liquid (soups, coffee, tea, milk). Menu planning can be adopted taking into account results from consumer waste monitoring.

Definition of waste: according to EU regulation (including liquid).

Indicators to use:

- Storage waste (i.e. waste which is generated due to spoilage while in storage): total kg/day and l/day, divided in food categories (e.g. food and vegetables, cereals, meat, dairy)
- Preparation Waste: total kg/day and l/day, divided in food categories (e.g. food and vegetables, cereals, meat, dairy)
- Plate waste: g/meal, divided in food categories

Methods: Appropriate methods for food waste quantification include direct weighing and waste compositional analysis. The types of food waste shall be accounted for. Methodologies for food waste monitoring can be found in García-Herrero et al. (2023), furthermore the International Food Waste Coalition has devised a monitoring and reporting methodology adapted to food services (IFWC, 2024). Digitally assisted means of monitoring can be employed.

2. Action

The tenderer will submit a prevention plan based on the results of the baseline monitoring which takes into account the types of food waste generated and the reasons causing food waste. The tenderer will implement prevention measures appropriate to the results of the baseline monitoring in accordance with the food use hierarchy.

- Staff training: employees (cooking staff, servers) shall be trained routinely on food waste monitoring and possibly actively be involved in the deployment of prevention actions (See CPC 2 on training for complementarity)

Menu planning:

- use a demand forecasting tool to ensure that production matches expected demand
- accommodate flexible meal planning (i.e.: be flexible to using food near its expiring date).
- adjust menu planning considering results of food waste monitoring.
- select packaging (taking into account aspects such as the format, protection, preservation, serving portions, etc.) that reduce the generation of food waste
- do not offer the full range of menu options from the start to the end of the service

Storage actions:

- ensure that the food is stored under the proper conditions, this entails checking that fridges and freezer are kept at the right temperature. This ensures both food safety and a longer shelf life.
- operate a back-to-front (first-in first-out) policy in the storage of food products and checking periodically the date of expiry.
- establish an accurate stock inventory and ordering system to avoid over-ordering and spoilage of stock.

Preparation

- if necessary, manage overproduction, such as freezing of excess food.
- avoid over-trimming of bulk meat, fish or whole vegetables or reuse the over-trimmings.
- cool down food quickly to avoid growth of microorganisms

Serving and consumption:

- do not prepare meals for presentation purposes only (use for instance photographs, or other illustrations, descriptions instead)
- adjust the meal portions and accommodating the quantities to the customers or providing more than one-size portions
- offer leftover takeaway options and/or internal routines for staff to eat food not consumed as well as to prepare the safe redistribution of surplus food if/where applicable
- If different meals are offered, it shall not be attempted to have sufficient supply for all of the meals. Meals for which surpluses are most acceptable are those that remain attractive and can be redistributed in the safest way.
- sensitise customers to food waste and the causes of food waste (e.g. using posters)
- increase customer acceptance of sustainability measures through communication
- implement a system that allows customers to give feedback on food portions and the quality of prepared meals (e.g. survey the reasons for plate waste using feedback sheets) and subsequently implement appropriate actions.

The tenderer shall communicate with guests about the key parts of the food waste prevention actions that it is putting in place, especially if it includes changes in service organisation.

When one or more actions are put in place, monitoring of food waste shall occur in such a way that ensures that the action is being effective (see chapter 8 for more information).

3. Food use hierarchy

Food waste shall be handled following the food use hierarchy and in accordance with national legislation. When possible, redistribution for human use shall be prioritised.

Verification

The tenderer must provide evidence in the form of standard operating procedures for purchasing, storage, cooking, menu planning and serving. The evidence must be completed by a description of channels through which the food waste prevention policy will be communicated to the guests.

In some countries and contexts, voluntary agreements might be in place between public and private stakeholders for food waste prevention, showing positive results in cutting food waste. If the tenderer has already committed to such an agreement, then it could be regarded as a verification, granted that the agreement includes routine monitoring and action implementation.

Best practices and examples

Examples of criteria in national provisions

France

Mandatory diagnosis on food waste and action plan (Republique Française 2018 - Loi Egalim⁶⁵)

Co-creation of recipes with end users

Italy

Food waste must be monitored and the reasons on the basis of which any food surpluses are generated must be analysed. Correction actions must be implemented (Minimum Environmental Criteria Regulation⁶⁶)

Austria:

The contractor shall implement at least five measures from a specified checklist to avoid food waste. (NaBe - Spezifikationen für die Beschaffung von Lebensmitteln und Verpflegungsdienstleistungen⁶⁷)

Spain

The Food Loss and Waste Prevention Law (Law 1/2025) requires catering services to: implement food waste prevention plans by April 3, 2026 (that is, all food sector companies must have a plan to identify and minimise losses); collaborate with social entities to donate surpluses to charitable organisations, always complying with legal requirements.

(Ministerio de la Presidencia, Justicia y Relaciones con las Cortes, 2025)

Catalunya (Spain)

The Germans Trias i Pujol Hospital has developed and implemented for years a comprehensive food waste prevention plan as part of its commitment to sustainability and efficient resource management. This plan is structured in several phases, from reducing waste generation to optimizing consumption and managing food surplus. Key actions within the plan include:

- Continuous monitoring of consumption and waste: daily and detailed tracking of food quantities distributed and discarded allows identification of critical points and optimisation of menus and portion sizes.
- Training and awareness for staff: workshops and internal campaigns have been conducted targeting hospital personnel, emphasizing the importance of waste reduction and promoting responsible practices in food handling and distribution.
- Improved planning and order management: using an advanced control system, order quantities are adjusted to actual needs, minimizing surpluses and losses.
- Collaboration with social organisations: edible surplus food is donated to social entities supporting vulnerable groups, contributing to the fight against food waste and social inequality.

This plan has enabled Germans Trias i Pujol Hospital to significantly reduce the amount of food wasted, optimizing costs and resources while fostering a culture of environmental and social responsibility within the institution.

Other successful experiences of food waste prevention in healthcare settings have been compiled by Healthcare without Harm (2016).

Valencia (Spain)

The University of Valencia includes in its tenders that, at the end of the meal service, any portions that have not been sold or delivered by other means that ensure their subsequent consumption and prevent waste must be offered at a reduced price so that they can be purchased to take away in containers provided by the cafeteria or in a container provided by the consumer (if the company does not consider this to be appropriate from a health point of view, the company may refuse to use the container provided by the customer). This must be clearly communicated through clearly visible signage, indicating the time during which these portions will be on sale, which must be for a minimum of 30 minutes. This measure is intended both to combat food waste and to provide accessible and healthy food options for cafeteria users.

Tools

— Handbook for reducing food waste – for health care, schools and care services from the Swedish Food Agency (2020)

A recent project has evaluated multiple interventions (Swannell et al., 2023) and plans put in place to reduce food waste, especially in public food services. The interventions factsheets can be found at Food waste action planner and further information is available in the Toolkit to reduce consumer food waste⁶⁸Food Loss and waste Protocol

6.3.1 Innovative approaches for food waste reduction

Rationale: Food waste reduction requires creative solutions and proactive efforts across all levels of the food supply chain (Candea et al., 2023). Suppliers are encouraged to explore a variety of innovative pathways to minimise waste, which may include leveraging technology to enhance the precision and efficiency of food waste monitoring or implementing new interventions that could lead to substantial waste reductions. Furthermore, establishing collaborative agreements can play a significant role in bringing together different stakeholders, fostering a collective effort towards shared goals in waste mitigation. To verify the commitment and capability of suppliers to implement these innovative approaches, they can be required to submit a comprehensive plan as part of their tender. This plan should detail the proposed approach, clearly stating the objectives and the key performance indicators (KPIs) that will be used to measure success. The presence of a well-defined implementation plan provides a framework for assessing the feasibility and potential impact of the supplier's strategies, ensuring that the innovation contributes effectively to food waste reduction within their operations (EU Platform on Food Losses and Waste, 2019).

Objective: Stimulate proactive actions towards food waste reduction.

AC 24. Food waste prevention innovation

Additional marks can be awarded to suppliers proposing in their offer to test and pilot innovative approaches in the reduction of food waste within their operation. These approaches could cover (but are not limited to):

- Advancements in automating food waste monitoring in food waste settings
- Experimenting innovative interventions (see the Food waste action planner for inspiration)⁶⁹
- Setting up collaborative agreements to facilitate stakeholder engagement and participation
- Innovative uses of surplus food

Verification

The tenderer shall supply a clear idea and implementation plan outlining the approach (objectives, KPIs) and the evaluation of its effectiveness.

⁶⁵ <https://www.legifrance.gouv.fr/loda/id/JORFTEXT000037547946/>

⁶⁶ <https://www.mvicriteria.nl/en/webtool>

⁶⁷ https://www.nabe.gv.at/wp-content/uploads/2021/06/6_Lebensmittel-und-Verpflegungsdienstleistungen_naBe-Kriterien.pdf

⁶⁸ https://knowledge4policy.ec.europa.eu/bioeconomy/reduce-food-waste_en

⁶⁹ https://knowledge4policy.ec.europa.eu/publication/food-waste-prevention-calculator-food-waste-action-planner_en

Best practices and examples

- Useful tools can be found by a recent project launched by the European Parliament (European Consumer Food Waste Forum, ECFWF⁷⁰).
- Testing interventions: A simple introduction to using experiments to evaluate consumer food waste interventions (Bruns & Nohlen, 2023).
- Evaluating interventions: Evaluation framework (Garcia-Herrero et al. (2023)).
- Examples to reduce food waste at consumer level: Food waste Toolkit⁷¹

6.4 Monitoring of sustainability indicators

Rationale: There is a lack of empirical information on the implementation and impacts of GPP and SPP (Cheng et al., 2018). Highlighting the importance of monitoring could contribute to a more widespread uptake of this criterion and ensure that future tenders include it. Monitoring however should occur not only for the single tender but should be embedded in a wider structure of reporting, at local, national and EU level. Presently, a common framework at EU level is lacking, although the Commission is launching a Procurement Data Space⁷². Further information and examples are proposed in chapter 8.

Objective: Guarantee that public procurement is fostering food sustainability as planned. Monitoring of public procurement application is instrumental for policy evaluation and to find the most suitable solutions to reach sustainable food systems. This criterion aims to facilitate monitoring activities.

Table 24. Gaps and proposed actions in monitoring of sustainability indicators.

Gaps identified from the technical analysis	Proposed Action
<ul style="list-style-type: none">— The technical analysis showed that monitoring continues to be a low priority for the implementation of public procurement.— According to the desk research analysis, criteria on monitoring hinge on the Eco-Management and Audit Scheme (EMAS) application, but challenges are reported in understanding how the data provided from this technical specification can be further transmitted to understand performance of overall sustainability of the food procured.— Understanding the impacts and effectiveness of SPP needs to be rooted in more widespread monitoring of its application.	<p>For the TS:</p> <ul style="list-style-type: none">— Integration of social aspects for SPP monitoring, using EU GPP TS 8 as a starting point.— Highlighting the importance of monitoring in the structure of the report. <p>Other actions not covered in this report:</p> <ul style="list-style-type: none">— Monitoring requirements should be accompanied by clear guidance and methodologies to follow, ensuring consistency.— For example, in quantifying environmental impacts, EU recommended methods such as the Environmental Footprint (EF) can be used.— Note that monitoring at tender level is a key addition and basis for broader monitoring of the policy.

⁷⁰ https://knowledge4policy.ec.europa.eu/projects-activities/european-consumer-food-waste-forum_en#latest-knowledge

⁷¹ https://knowledge4policy.ec.europa.eu/bioeconomy/reduce-food-waste_en

⁷² https://single-market-economy.ec.europa.eu/single-market/public-procurement/digital-procurement/public-procurement-data-space-ppds_en

TS 32. Monitoring of sustainability indicators

The tenderer shall have operational procedures to monitor sustainability indicators with the purpose of evaluating the implementation and impact of its activities. The following indicators shall be gathered through appropriate methodologies.

The indicators can help pinpoint areas for improvement of the food service operation. Suitable actions shall be put in place to optimise operations especially regarding the serving of plant-based meals, food waste, energy and water saving, staff training. Monitoring shall be continuous and be used to track progress.

Monitoring responsibilities must be clearly delineated between the contracting authority and the service providers.

The indicators are divided in “core” and “comprehensive” to indicate their higher or lower priority respectively.

Indicator	Suggested units	Priority
Amount of food purchased and sold	<ul style="list-style-type: none"> — Purchase orders/invoices for the total food over a year and the precise food categories — Meals prepared (representative weeks) by mass of each ingredient used (Threshold: all foods exceeding 1 kg of use/week shall be recorded) 	Core
Healthy and sustainable meals	<p>Amount of nutrients and servings of food groups per day/week as applicable</p> <p>Evidence that all packaged and ready-to-eat foods offered (including in vending machines) meet nutritional criteria</p> <p>Evidence that all meals have been designed, calibrated, and regularly monitored at least on an annual basis by registered professionals with accredited training in nutrition and/or dietetics.</p> <p>% of plant based of total food purchases compared to % of animal based products</p>	
Hours of staff training hours	<ul style="list-style-type: none"> — Hour per type of employee (e.g. function in the company) — Type of training, basic safety, food safety, Diversity and inclusion, environmental management) 	
Food waste	g/meal or total kg per food category	
Customer satisfaction	Satisfaction with the food, the services and the communication provided (a business to client indicator)	Comprehensive
Tenderer satisfaction	The satisfaction of the contract authority with the tenderer's performance (a business-to-business indicator)	
Waste	<ul style="list-style-type: none"> — g/meal or total kg sorted in paper/cardboard, glass, plastic, metal and residual waste 	
Energy consumption	<ul style="list-style-type: none"> — kWh and l (total yearly) 	
Water consumption		
Environmental impact	<ul style="list-style-type: none"> — GHG emissions per meal (CO₂ eq./meal) — possibly other relevant impact categories described in the Environmental Footprint method recommended by the EC 	
Transport	In case the service includes the delivery of food, and the fleet is under the tenderer's control, the fuel consumption of the vehicles used for the food delivery (l/km.meal)	

Verification

The tenderer must provide the procedure:

- for monitoring and recording the indicators pointed out in section 1) at least twice yearly.
- to ensure the implementation of the operational procedures.
- to correct the deviations found in the evaluation, and if possible, prevent them in the future.

Environmental management systems that are certified against ISO 14001 or EMAS, and services holding a Type 1 ecolabel are deemed to comply, if they fulfil the following environmental objectives: increase in vegetable consumption, minimisation of food waste, other waste, energy and water and if applicable, minimisation of fuel consumption.

The tender can also use the Environmental Footprint method as recommended by the European Commission (European Commission, 2021a) to evaluate the environmental impacts of the indicators described above.

The tenderer must show an environmental policy committed to achieving these objectives, together with the certificate issued by the certification body.

Best practices and examples

University of Oslo (Norway)

The contracts for the university's dining services stipulate several minimum standards concerning climate, environment, and health, which influence the offered menu selection. There are established carbon footprint limits for various meal types. Additionally, the contracts set maximum and minimum percentages for the inclusion of specific ingredients in each meal, such as fruits, vegetables, and whole grains. Traceability and due diligence are required for each raw material. In this context, WWF's guides for fruits and vegetables, seafood, and meat serve as references. Ingredients marked with a green light in these guides do not necessitate separate due diligence assessments. This approach promotes increased use of organic raw materials and allows for a limited inclusion of red and white meat. The procurement process is distinguished by its emphasis on rewarding improvement

Tools

- Use of LCA to assess the environmental impacts of the procurement as well as to evaluate different offers (see chapter 8 for further details). The use of Environmental Footprint methods is recommended.
- One notable proposition extracted from the analysis is the application of the Social Return on Investment methodology to ensure the application of social procurement principles in the Netherlands (Dutch public procurement agency)⁷³.
- Guidelines from Wageningen University "Sustainability in the catering sector requires uniform data collection and reporting, as well as sector agreements on responsibilities and assurance." (Vervelde, 2025)

⁷³ <https://www.pianoo.nl/en/sustainable-public-procurement/spp-themes/social-return-investment-sroi>

7 Criteria for which no changes are proposed

The following criteria are proposed to remain unchanged from the existing EU GPP criteria, as no relevant major improvements were identified through the analysis conducted.

Table 25 indicates where these criteria can be found in the 2019 GPP technical report. Once the Sustainable Public Procurement criteria will be agreed, the following unchanged criteria will also be included in the final report.

Table 25. EU GPP criteria proposed to remain unchanged from the 2019 technical report.

Procurement stage	EU GPP criteria	Section from the 2019 report
Food	Agricultural products labelled with geographical indications	2.2.9
Food Services	Other waste: prevention, sorting and disposal	3.2.4
	CPC Food and beverage redistribution	3.3.5
	Chemicals and Consumable goods	3.2.5
	Purchase of new kitchen equipment	3.3.2
	Provision of low impact drinking water	3.3.1
	Energy and water consumption in kitchens	3.2.6
	Food redistribution	3.3.5
	Food transportation	3.2.7
Vending Machines	Fair and ethical products	4.2.2
	More environmentally friendly vegetable fats	4.2.3
	Organic food products	4.2.1
	Smart controls	4.2.4
	Energy consumption and GWP of refrigerants	4.2.4
	Purchase of new vending machines	4.3

Source: Adapted from Boyano Larriba, A. Espinosa Martinez M. N., Rodriguez Quintero R., Neto B., Gama Caldas, M., Wolf O., EU GPP criteria for Food procurement, Catering Services and Vending machines, EUR 29884, ISBN 978-92-76-12119-0, doi: 10.2760/748165, JRC 118360. Also available at link⁷⁴.

⁷⁴ <https://ec.europa.eu/docsroom/documents/42743>

8 Further supporting tools for SPP implementation

Stakeholders and procurement scholars have pointed to the lack of tools supporting the application of green and sustainable criteria (Falvo, 2024). This section presents possible relevant tools and guidelines which can support a more widespread evidence-based implementation of sustainable procurement for food and food services: life cycle assessment to evaluate environmental impacts (section 8.1); guidelines and strategies for implementing nutritional criteria (section 8.2); monitoring and evaluation (section 8.3); market dialogue (section 8.4); integrated food system policies and stakeholder participation (section 8.5).

8.1 Life cycle assessment to evaluate environmental impacts

As stated in the Better Regulation Toolbox (European Commission, 2023a), life cycle thinking (LCT) delivers an integrated assessment of the benefits and the burdens in terms of environmental, social, and economic aspects. LCT requires specific methods for impact quantification, such as Life Cycle Assessment (LCA) to assess environmental impacts, social LCA to evaluate social impacts, and Life Cycle Costing (LCC) to assess direct and indirect economic impacts. The combination of these assessments methods provides a complete and comprehensive Life Cycle Sustainability Assessment.

LCC to support the assessment of economic impacts

In EU GPP criteria (Boyano et al., 2019), life cycle costing (LCC) was singled out as a method to evaluate tender proposals.

The LCC approach accounts for all cost factors over the life of a product or service. Life cycles can include food and appliances production and acquisition, meal preparation, maintenance, and end-of-life disposal costs. By applying LCC, the public authority can identify what is driving the cost of its organisation and optimise where possible the procurement process. Moreover, it supports making long-term savings and better allocation of public funds by shifting the focus from the initial purchase price to the **total cost of ownership**. In the context of this report, LCC seems to be particularly fitting in the purchase of durable goods, such as kitchen appliances, water dispensers, vending machines etc. Examples of application of LCC can be found in Sweden where LCC use is awarded in criteria concerning the purchase of new kitchen equipment⁷⁵. The regional government of Flanders has also promoted the use of the tool in support of procurement of vending machines⁷⁶.

However, it should be noted that labour costs can be the hotspots of food service operation (García-Herrero et al., 2021), and that implementing certain sustainability criteria (sorting waste, preparing fresh and healthy meals) might result in higher labour costs. Further research should focus on quantifying these costs.

LCA for effective sustainable public procurement

In an effort to expand the notion of sustainable procurement to further address environmental impacts, LCA studies can be conducted. The following paragraphs provide an overview of what is an LCA and how it could be used in support of more sustainable procurement.

LCA is a method to assess the environmental impact of a product, or service. It covers the whole life cycle of the product or service, from the extraction of raw materials through their manufacturing and usage, to their recycling or disposal. Conducting a Life Cycle Assessment (LCA) helps identify

the specific stages and factors contributing to environmental impacts throughout an organisation's operations. By analysing the results, public authorities can pinpoint the root causes of these impacts and develop targeted strategies to minimise their environmental footprint. It can also help to identifying trade-offs.

How to conduct LCA

LCA allows comparisons and comparative assertions of one product compared with another product and it is also increasingly used in policymaking (Sala et al., 2020).

LCA can be used to support EU policy development, as already included in some European Green Deal initiatives, as it can help in defining environmental challenges, or policy options based on their environmental output; compare product groups and sectors; support implementation of UN SDGs at product and/or service level.

Concretely, running LCA involves 4 main steps as described in ISO 14040/44:2006. These are summarised in Box 1.

Box 1. Steps in Life Cycle Assessment.

1. Goal and Scope Definition: The first step in an LCA is to define the goal and scope. This includes identifying the product or process to be assessed, the purpose of the study, and the intended audience. For food procurement, the goal might be to compare the environmental impacts of different food items or suppliers, of the total procurement over a year.

2. Inventory Analysis: This step involves data collection and calculation procedures to quantify relevant inputs and outputs related to a product. For a food product, this can include everything from the resources used in producing the food (like amount of water, land, and energy understood as inputs), from food processing and packaging (e.g. amount of energy and water needed for processing activities, packaging material impacts due to natural resources extraction), and the emissions from transporting the food to the market and to the final destination where food will be consumed. It is also relevant to account for cooking activities, their inputs, and quantify for the food that will not be consumed (i.e. food waste) and how it will be treated as waste.

3. Impact Assessment: This step aims to understand and evaluate the magnitude and significance of the environmental impacts for a product system throughout the life cycle – the whole food supply chain. It could be emissions contributing to climate change, water pollution from agricultural runoff, or waste generation from packaging. There are different impact categories which can be assessed (16 according to the Environmental Footprint method from the European Commission), and different impact assessment methods. When food is the object of the analysis, impact categories such as climate change, eutrophication, water use, land use and acidification can be particularly relevant.

4. Interpretation: The final step is to analyse the results, draw conclusions, and make recommendations based on the hotspots (where most impacts occur, e.g. at the primary production level, and why, e.g. due to the use of inorganic fertilisers and pesticides). This step could involve identifying opportunities to reduce the environmental impact as well as simulating scenarios. Scenarios can include the replacement of these fertilisers or pesticides or going towards products using agricultural practices with less inputs to the soil.

LCAs can be a complex process, as it requires substantial resources in terms of knowledge and skills, together with software and databases. However, there is an increasing number of services and simplified tools to support stakeholders in undertaking this process. For example, there is evidence of some municipalities or specific stakeholders using LCA to measure their environmental impact, specifically climate change impacts, also through simplified tools. While this is already a major achievement, other environmental impacts in (beyond climate change) should also be addressed. Among the different methods and models available in LCA, the European Commission recommends the use of the Environmental Footprint (EF) methods (European Commission, 2021a).

The EF methods include 16 different impact categories, such as climate change, ozone depletion, and water use, among others, to ensure a broad and thorough assessment of environmental impacts across different areas.

Despite its comprehensiveness, also the EF, like other LCA methods, faces limitations in capturing all the complexity of agri-food systems. These aspects are acknowledged and tackled by the continuous development and update of the EF methods, as well as the use of complementary methodologies and additional supporting evidence.

As mentioned in other sections, conducting a full LCA study can be knowledge and resource intensive, which could make its application challenging for SMEs. It could therefore be more suited for tenders aimed towards bigger contractors. However, examples of LCA use in public procurement exist, making use of supporting tools. For example, in Norway the central procurement agency uses a climate change footprint calculator to guide public authorities to make more climate-friendly choices.

Integration with LCC

There are several studies coupling LCA and LCC to provide an economic and environmental assessment of food services (Petit-Boix et al. 2017), including the role of food waste (García-Herrero et al., 2019, 2021).

This holistic approach allows combining the environmental and economic dimensions of sustainable public procurements using methods that can bring in each segment of the food supply chain the respective hotspots to be addressed. This information can support decision makers towards procurements having a positive economic but also environmental performance. These decisions can inspire suppliers to adopt more sustainable practices and therefore, in a long-term perspective, move towards more sustainable food systems.

Other methodologies to ensure a proper evaluation of social aspects, such as Social Life Cycle Assessment (UNEP 2020), could also be integrated but still little research is available to understand potential integration with LCA and LCC in the food procurement arena.

Moreover, LCA can be coupled with the nutrition dimension in the called nutritional LCA. This studies the provision of nutrient(s) as either the main function or one of the main functions of a food item, which is relevant in the revision of food items, meals, and dietary studies better capturing health impacts (McLaren et al. 2021).

Both LCA and LCC require specific technical capacity, as well as resources to conduct analyses. For the in-depth analysis of the environmental impact associated with procurement, the EU recommended Environmental Footprint methods should be applied to the extent possible to ensure coherence and comparability.

Examples of LCA application in food public procurement

A recent review conducted by Casonato et al., (2024) collected examples of LCA-based application in support of SPP implementation. LCA emerges as methodology which can help in quantification of impacts and hotspots identification in the public setting, to help the prioritisation of procurement objectives. Tools for improved menu and recipe planning have also been found, which incorporated nutritional and economic indicators for a more comprehensive assessment. Some notable examples are shown in Table 26.

The use of these tools can contribute to inform public authorities, which can better understand what aspects of their procurement drive environmental impacts and thus put in place appropriate strategies to reduce environmental impacts associated with their operations.

Table 26. Examples of LCA application.

Example	Approach	Benefits and challenges
City of Copenhagen quantification of climate change impacts related to some procurement operations of the city (nurseries, care homes).	Through the use of the Cool Food Pledge Calculator (WRI, 2020) Lassen et al., 2021a, Lassen et al., 2021b.	<p>Benefits: LCA-based calculator can be a useful and easy to use tool for contracting authorities, coupled with nutritional assessment.</p> <p>Challenges: only climate change is calculated, cradle-to-gate life cycles – e.g. considering all impacts from raw material to retail is considered without taking into consideration the whole life cycle, only secondary data used.</p>
Italy – <i>Meno per più</i> assessment of procurement in university settings.	Ad – hoc consultancy, <i>Meno per più</i> (2024).	<p>Benefits: multiple impacts are calculated beyond climate change such as biodiversity impacts, acidification, etc., more precise calculation.</p> <p>Challenges: small sample of meals.</p>

Source: Authors' own elaboration

The Cool Food Pledge calculator (WRI, 2020) has also been used by other municipalities in Europe, and it seems like a valuable approach in further supporting public authorities in quantifying impacts of foods. However, it focuses only on climate change. Further research and efforts should go into developing tools for food system stakeholders, including public authorities, to help them operationalise LCA.

8.2 Implementing nutritional criteria: guidelines and strategies

The listed nutritional criteria have been developed by integrating existing nutritional criteria from EU MSs (García-Herrero et al., 2024), incorporating the latest scientific evidence, and aligning them with evidence-based food-based dietary guidelines (European Commission, 2025b). When analysing the existing criteria from EU MSs, it was observed that multiple countries' nutritional criteria for public procurement provide valuable examples for implementation in various settings, which can be useful to stakeholders in implementing the nutritional criteria.

Moreover, it is crucial to ensure that the menus are designed, calibrated, and regularly monitored by registered professionals with accredited training in nutrition and/or dietetics. This approach helps guaranteeing that the nutritional criteria, which may require for example avoiding certain nutrients or setting upper limits, are consistently met. It is also essential to require food suppliers to provide clear and comprehensive nutritional information on their products and monitor food offer, which will facilitate the evaluation process.

Finally, it is encouraged to foster collaboration among stakeholders, particularly tenderers and food suppliers, to develop and provide healthier food options that align with the listed nutritional criteria.

8.3 Monitoring and evaluation at different levels

Lack of monitoring and evaluation of public procurement contributes to notable knowledge gaps in the field, as extensively analysed in Sanyé Mengual et al. (2024a). Increasing the monitoring capacity of this policy is however fundamental to understand if EU GPP/SPP criteria are being implemented in tenders and eventually to assess the actual impacts. The technical analysis showed how monitoring can occur in different ways at different levels, and how diverse tools can be deployed to support monitoring capacity of procurers, regional and national authorities. Effective monitoring is a precondition for the ex-post evaluation of policy measures.

At **national level**, France is one of the few MSs which provides a requirement for providing annual statistical reports on the share of products complying with the overall targets and criteria included in the National guide for public procurement. France introduces sustainability in public procurement through overarching targets regarding the purchase of organic, quality and sustainable products, food waste etc. The dashboard “Ma Cantine”⁷⁷ enables the single contracting authorities to input their results and can benchmark the performance against others.

In other MSs, monitoring is carried out on a voluntary basis or with the help of civil society organisations. Such example can be retrieved in Italy, where some uptake information on GPP is monitored by an environmental organisation (Legambiente, 2024) and food procurement for sample schools is specifically monitored by another (FoodInsider, 2024).

Another example from Slovenia provides consolidated data on tender notices through a government portal⁷⁸.

In Spain, recent legislative developments have enshrined monitoring of compliance with nutritional and sustainability standards in school canteens. Regional health authorities conduct inspections in school canteens to verify compliance, also in line with National Plan for Official Control of the Food Chain. These inspections focus particularly on the nutritional aspects (portions of fruits, vegetables, legumes, and limits on processed foods). The program includes both document reviews (planned menus and supplier data) and on-site inspections. The monitoring results feed into national reports and help guide enforcement, training, and future policy improvements (AESAN, 2023).

All MSs can implement national frameworks that encourage monitoring the implementation of SPP. MSs can also ensure that regional and municipal authorities are well equipped to implement and monitor SPP, both through appropriate regulatory frameworks and capacity building initiatives

In the EU, efforts are being made to standardise reporting and monitoring by public authorities through the TED database⁷⁹ and the Public Procurement Data Space⁸⁰. However, since the procurement criteria and reporting are voluntary, the sharing of information relies on the willingness of public authorities to report, which can lead to inconsistencies.

National and regional authorities should develop monitoring systems to check the uptake of SPP criteria. Further research is also needed to develop comprehensive sustainability assessment frameworks to understand empirically the impacts associated with a shift to SPP. As mentioned in chapter 8.1, LCT-based methods provide a robust framework but lack operationalisation in their application from public authorities.

⁷⁷ <https://ma-cantine.agriculture.gouv.fr/accueil>

⁷⁸ <https://ejn.gov.si/statist.html>

⁷⁹ <https://ted.europa.eu/en/>

⁸⁰ https://single-market-economy.ec.europa.eu/single-market/public-procurement/digital-procurement/public-procurement-data-space-ppds_en

Communities of Practice or other knowledge sharing activities could be organised, at EU and national level, to further expand the uptake of SPP criteria and to share best practices.

8.4 Market dialogue

A **market dialogue** is a process to facilitate the interaction between contracting authorities and suppliers before the start of the public procurement procedures, to inform stakeholders of the procurement plans and possible requirements. The objective is to understand the supply, the availability of certain products and to what extent the sustainability criteria can be fulfilled. This enables the contracting authority to adapt the tenders, including what technical specifications, award criteria and thresholds can be applied in each specific situation. This process can ensure that the sustainability objectives are feasible and met. Article 40 Directive 2014/24/EU establishes conditions to carry out a market dialogue.

Objectives of the market dialogue are:

- to improve market knowledge (on availability, prices, identify suppliers who will be able to carry out the contract);
- to provide knowledge and opportunities for small-scale farmers, SMEs and local producers to participate in the procedures;
- to make suppliers and other stakeholders with relevant knowledge aware of public needs which could be covered by future procurement exercises;
- to strengthen relations between public authorities and suppliers;
- to identify possible barriers to the implementation of specific requirements of the tender;
- to create the opportunity to gather feedback.

Efficient communication is key to encourage suppliers to respond to tender invitations. Some examples are included in the INNOCAT project⁸¹, or the European Market Observatory for Fisheries and Aquaculture Products⁸². The regional government of Wallonia also provides a guide to market dialogue in the formulation of their sustainable public procurement policy.⁸³

Market dialogues were also initiated by various municipalities participating in the SchoolFood4Change⁸⁴. The objective of these market dialogues was the redesign of school food systems with a focus on sustainability, nutrition, and stakeholder engagement. This dialogue involved a wide range of participants, including municipal school representatives, catering providers, procurement officers, farmers, students, and families. Over several structured sessions, stakeholders jointly examined the local context and co-developed specifications for upcoming public procurement contracts. The dialogue emphasised the integration of robust environmental and social criteria—going beyond national minimum requirements. The specific objectives of these processes included: sourcing of products with a lower environmental impact, training for cooking staff and promote fair working conditions, design of inclusive, culturally sensitive, and nutritious menus, waste reduction and sustainability monitoring mechanisms. The outcomes of these dialogues led to the successful implementation of new meal services in many municipal schools.

⁸¹ Collection of best practices: Engaging the market in public procurement – INNOCAT project ICLEI Europe Projects (iclei-europe.org)

⁸² European Market Observatory for Fisheries and Aquaculture Products (EUMOFA) <https://eumofa.eu/dashboards>

⁸³ <https://marchespublics.wallonie.be/pouvoirs-adjudicateurs/outils/achats-publics-responsables/clauses-sociales.html>

⁸⁴ <https://schoolfood4change.eu/>

Market dialogue can also be expanded to diverse stakeholders of the public food sector, such as civil society, public health authorities or other actors to ensure that the tenders are not drawn up only based on market availability but also account for sustainability objectives.

A successful example of collaboration between procurers and suppliers can be found in Barcelona, where Ecocentral⁸⁵, an organic purchasing centre, serves around 120 educational centres in the province. Ecocentral is a cooperative wholesaler catering specifically to public school canteens. Once a year, all stakeholders meet and agree on prices for the entire upcoming academic year.

8.5 Integrated food system policies and stakeholder participation and involvement

Any action aimed at increasing sustainability hinges on the participation and involvement of stakeholders, which in the context of public procurement involves everyone from producers to kitchen staff and, ultimately, the final customers/guests. This practice is already well used in policymaking, as shown by the recent citizens' panels and platforms⁸⁶.

At the local level, food councils, municipal food policies and participatory governance processes can also be fundamental enablers of citizen participation.

Furthermore, the buyer should be responsible for developing a comprehensive purchasing strategy that aligns with the organisation's broader goals and objectives. This entails a meticulous approach to drafting the tender dossier, ensuring clarity, transparency, and adherence to best practices in the procurement process. Therefore, stakeholders' engagement, making them at the core of the procurement, is key to reach sustainable food systems. By emphasising these key elements, the focus extends beyond compliance with future potential criteria, paving the way for a more strategic and impactful approach to procurement activities.

Box 2 shows an example of stakeholders' engagement for educational settings.

Box 2. Whole School Food Approach method.

The "Whole School Food Approach" (WSFA) is a method for developing a healthy and sustainable food culture in and around schools. It is an evidence-based intervention that contributes to community-wide systemic change and positively affects education, sustainability, inequalities, communities and health. The WSFA sees schools – from preschools to secondary schools – as catalysts for sustainable food system change. The method integrates food and education: it addresses the composition of school meals and the functioning of school canteens, includes practical teaching, learning activities and the active participation of pupils and teachers, and involves the wider school community (including caregivers, farmers, businesses and civil society) (School Food 4 Change, 2022). In educational settings, it is important that all school staff, including teachers and cooking staff, is informed about the food served on the premises. This ensures that everyone gives the same message and supports healthy, sustainable eating.

⁸⁵ <https://ecocentral.cat/el-projecte/>

⁸⁶ https://citizens.ec.europa.eu/index_en

9 Discussion and conclusions

The EU GPP criteria introduced in 2019 are comprehensive in addressing environmental issues. However, the lack of economic and social aspects related to food, particularly nutrition, represents a limitation in the transition towards more sustainable food systems. This document aims to include socio-economic and nutritional criteria and overcome current gaps in EU GPP criteria by listing sustainable public procurement criteria (SPP) for food, thus expanding the scope of this policy instrument by adopting a system perspective. The listed SPP criteria are complemented, when possible, by examples and tools which can further support their actual implementation within procurement strategies.

The criteria have been selected and listed after an extensive analysis of existing procurement policies in the EU. It is worth noting that the criteria however cannot act alone. Criteria implementation in tenders needs to align with wider policy or organisational objectives. For effective implementation, contracting authorities require actionable tools and training. In this respect, market dialogue emerges as a fundamental feature of sustainable procurement.

The listed criteria aim to address food system sustainability hotspots. Further research should focus on the possible synergies between the different criteria as well as on possible overlaps and need to ensure full consistency with other EU policy areas, as providing a holistic approach could help in better illustrate the concept of sustainability.

Moreover, the inclusion of methods such as LCA is key as it can accompany the design, implementation, monitoring and evaluation of procurement measures, by accounting for the entire food supply chain, thus being instrumental in the identification of sustainability hotspots of the food system and the design and deployment of more targeted interventions.

Monitoring and evaluation constitute big research gaps in the field of public procurement, and the lack of empirical evidence on impacts is also shown by scientific research (Cheng et al., 2018).

Recent studies have also pointed to the limited uptake of sustainable procurement criteria due to the voluntary nature of this policy instrument. Many stakeholders and researchers alike agree on the need for the introduction of mandatory minimum criteria to support the transition to sustainable food systems (EU Food Policy Coalition, 2022; Sanyé Mengual et al., 2024; Falvo, 2024; Schebesta, 2018). However, building up adequate awareness, knowledge, and experience is essential and such action should therefore be supported with tools and capacity building, especially for MSs which are less advanced in the implementation of sustainable procurement.

The system perspective required by the complexity of food systems implies identifying and understanding system components, their interactions and the relevant actors involved, to maximise synergies and minimise trade-offs. In particular, **possible sustainability trade-offs need to be considered** due of the implementation of various criteria, both between single environmental impacts and sustainability dimensions. For example, the implementation of plant-based menus planning could initially lead to an increase in food waste if consumer acceptability has not yet been established. This shift might undesirably transfer the environmental burden from animal products to increased plant waste. In addition, excessive administrative burdens related to highly specific verification processes could penalise small providers or lead to higher costs. It is advised that **contracting authorities** select the specific criteria based on their **context and conduct market analyses and dialogues with stakeholders** prior to the drafting of the tender. Indeed, **participation and involvement of stakeholders** is key for any action aimed at increasing sustainability of the food system.

Policy coherence with other EU actions has been taken into consideration to the extent possible in the listed SPP criteria. The shift towards sustainable food systems envisioned by the European Green Deal and reaffirmed in the Vision for Agriculture and Food requires a comprehensive and coherent approach across all policies. This document outlines proposed actions that could enhance research and promote the seamless adoption of SPP criteria, while also defining the direction of the research agenda.

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List of abbreviations

Abbreviations	Definitions
AC	<p>Award Criteria. At the award stage, the contracting authority evaluates the quality of the tenders and compares costs. Contracts are awarded on the basis of most economically advantageous tender (MEAT). MEAT includes a cost element and a wide range of other factors that may influence the value of a tender from the point of view of the contracting authority including environmental aspects (refer to the Buying Green 2016). Everything that is evaluated and scored for award purposes is an award criterion. These may refer to characteristics of goods or to the way in which services or works will be performed (in this case they cannot be verified at the award stage since they refer to future events. Therefore, in this case, the criteria are to be understood as commitments to carry out services or works in a specific way and should be monitored/verified during the execution of the contract via a contract performance clause). As technical specifications, also award criteria must be linked to the contract's subject matter and must not concern general corporate practices but only characteristics specific to the product being procured. Link to the subject matter can concern any stage of the product's life cycle, including its supply-chain, even if not obvious in the final product, i.e. not part of the material substance of the product. Award criteria can be used to stimulate additional environmental performance without being mandatory and, therefore, without foreclosing the market for products not reaching the proposed level of performance.</p>
ASC	Aquaculture Stewardship Council
BMI	Body Mass Index
CPC	<p>Contract Performance Clauses. Contract performance clauses are used to specify how a contract must be carried out. As technical specifications and award criteria, also contract performance clauses must be linked to the contract's subject matter and must not concern general corporate practices but only those specific to the product being procured. Link to the subject matter can concern any stage of the product's life cycle, including its supply-chain, even if not obvious in the final product, i.e. not part of the material substance of the product. The economic operator may not be requested to prove compliance with the contract performance clauses during the procurement procedure. Contract performance clauses are not scored for award purposes. Compliance with contract performance clauses should be monitored during the execution of the contract, therefore after it has been awarded. It may be linked to penalties or bonuses under the contract in order to ensure compliance.</p>

Abbreviations	Definitions
CVD	Cardio Vascular Disease
DALY	Daily Adjusted Live Years
EFSA	European Food Safety Authority
FBDG	Food Based Dietary Guidelines
GPP	Green Public Procurement: is a voluntary instrument defined in the Commission Communication "COM (2008) 400 - Public procurement for a better environment" as "...a process whereby public authorities seek to procure goods, services and works with a reduced environmental impact throughout their life cycle when compared to goods, services and works with the same primary function that would otherwise be procured."
Hotspot	It refers to the areas of concern/ of interest in the food system which would require action in order to ensure sustainability from an environmental, social, nutritional and economic perspective, and that can be addressed by public procurement provisions.
LCA	Life Cycle Assessment
LCC	Life Cycle Costing (An economic assessment considering all agreed projected significant and relevant cost flows over a period of analysis expressed in monetary value. The projected costs are those needed to achieve defined levels of performance, including reliability, safety and availability.) From UNEP guidelines
MSC	Marine Stewardship Council
NCD	Non-Communicable Diseases
Option A/B	Signals the possibility to apply different formulations of the criteria
RSPO	Roundtable on Sustainable Palm Oil
SC	Selection Criteria. Selection criteria refer to the tenderer, i.e. the company tendering for the contract, and not to the product being procured. It may relate to suitability to pursue the professional activity, economic and financial standing and technical and professional ability and may- for services and works contracts - ask specifically about their ability to apply environmental management measures when carrying out the contract.
SFA	Saturated Fatty Acids

Abbreviations	Definitions
SPP	Sustainable Public Procurement: A process whereby organisations meet their needs for goods, services, works and utilities in a way that achieves value for money on a whole life basis in terms of generating benefits not only to the organisation, but also to society and the economy, while minimizing damage to the environment. When sustainable procurement is conducted by public authorities we speak of Sustainable Public Procurement (SPP). In this report, when using the term SPP we are referring to sustainable public food procurement, covering food, catering services and vending machines.
SSB	Sugar Sweetened Beverages
STECF	Scientific Technical and Economic Committee for Fisheries
TS	Technical Specifications. These constitute minimum compliance requirements that must be met by all tenders. It must be linked to the contract's subject matter (the 'subject matter' of a contract is about what good, service or work is intended to be procured. It can consist in a description of the product but can also take the form of a functional or performance-based definition.) and must not concern general corporate practices but only characteristics specific to the product being procured. Link to the subject matter can concern any stage of the product's life cycle, including its supply-chain, even if not obvious in the final product, i.e. not part of the material substance of the product. Offers not complying with the technical specifications must be rejected. Technical specifications are not scored for award purposes; they are strictly pass/fail requirements.
WHO	World Health Organisation

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Annexes

Annex 1. Targeted stakeholder consultation

This report and the criteria described within were first submitted to an internal consultation with other services of the European Commission and adapted accordingly. Subsequently, the report was also shared with stakeholders active in food procurement in a targeted consultation, aiming to receive feedback, enhance the coverage and facilitate possible implementation of the criteria. The consultation was carried out via BATIS (Best Available Techniques Information System), a JRC platform dedicated to technical consultations. More than 200 stakeholders active in the field of food and procurement were invited by email to register to BATIS, participate in an online webinar and provide comments. The invited stakeholders were identified based on consultation activities of the previous contractor's supporting study (Task 1 of this project, Lermant et al. (2024)). The members of the Commission's Advisory Group on Sustainability of Food Systems and of the Government Experts Group on Public Procurement were also invited. The participation was open; additional stakeholders contacting the JRC and requesting participation were invited to register in BATIS. The consultation was carried out between 30 May 2025 and 20 June 2025; during the consultation period the JRC organised an online webinar (12 June 2025) where it presented an overview of the draft criteria and discussed them with approximately 90 stakeholder participants. A total of 122 stakeholder organisations registered in BATIS, and 48 of them (see Box A.1.1 below) provided comments. Of the latter, 15 (31%) were EU national or local authorities, 15 (31%) were food business operators/associations, 11 (23%) civil society organisations, 5 (10%) academia/research and 2 (4%) consultancies/think tanks. The JRC considered and carefully reviewed all received feedback and comments before finalising this report.

Box A.1.1: Stakeholders that provided comments for this report*

- Austrian Agency for Health and Food Safety
- Austrian Federal Ministry of Agriculture and Forestry, Environment and Water Management
- BioForum Vlaanderen
- Catalan Government, Department of Territory and Sustainability
- Copenhagen Municipality
- CONCITO Denmark
- Eurogroup for Animals
- Euromilk
- European Breakfast Cereal Association
- European Institute for Animal Law and Policy
- European Margarine Association - IMACE
- European Snacks Association
- Fair trade Advocacy Office
- Flemish regional government
- Food Drink Europe
- Food Service Europe
- France Urbaine
- GAIA Belgium
- Gent Municipality
- Green REV Institute
- Hansel Finland
- IFOAM - Organics Europe
- International Sweeteners Association - ISA
- Institute of Public Health, Portugal
- Local Governments for Sustainability - ICLEI
- Mensa Civica
- Ministry of Agriculture and Forestry, Finland
- Ministry of Health, Austria
- Ministry of Health, Hungary

- Ministry of Health, Portugal
- Ministry of Health, The Netherlands
- Ministry of Health, Slovenia
- Oatly
- Platewise
- Proveg
- Rikolto
- SAPIENS network
- Silesian Medical University, Poland
- Social Services Europe
- Spanish Agency of Food Safety and Nutrition
- The Norwegian Agency for Public and Financial Management
- UNESDA – Soft Drinks Europe
- University of Alcalá - Law
- Upfield – Floral Food Group
- Vending Machines Europe
- Voedingscentrum
- World Resource Institute
- WRAP - The Waste and Resources Action Programme

Source: JRC Own elaboration. *as self-registered in BATIS

Annex 2. List of Best practices, tools and examples to support SPP implementation

Monitoring

City of Ghent (SchoolFood4Change)

Good Practice: Measuring greenhouse gas emissions in Ghent (Belgium)

The City of Ghent is committed to making food more climate friendly and lower the food related greenhouse gas (GHG) emissions of its school meals. Calculating GHG emissions is considered a challenging task for municipalities. For this reason, the city joined the Cool Food Pledge of the World Resource Institute, to receive support, advice and inspiration on how to lower emissions and gain access to a scientific method for assessing CO2 emissions.

Inspired by an approach of offering more plant-based dishes, the City of Ghent decided to have menus re-designed in its new school meals tender. Potential caterers were challenged to offer tasty, child-friendly meals with a positive impact on the environment and with a smaller CO2 footprint. Based on the health guidelines of the Flanders region, the City of Ghent decided the ideal lunch should contain:

- Vegetable soup.
- Half a plate: seasonal vegetables.
- Quarter of the plate protein made of 50% plant based and 50% animal based.
- Quarter of the plate with potatoes or some other whole grain product.

From 2021 (when possible), the menu provides meals that include 50% plant and 50% animal-based protein. The menu offers sausages, meatballs, burgers or as stews or curries – for example, a fish curry with oyster mushrooms. Some dishes were not adapted because the best recipe was the traditional one, but these are compensated with a full vegetarian dish. In this way, the 50/50 balance of plant and animal-based menus is reached on a weekly basis.

Since 2019, information about the food purchased in the previous year has been sent to the World Resource Institute for assessment. Compared with a 2018 baseline assessment of the carbon emissions associated with the city's procurement, the 2021 monitoring showed a decrease in the carbon emissions. This calculation however was executed through the Cool Food Pledge Calculator which uses different metrics, such as the carbon opportunity cost.

City of Barcelona (SchoolFood4Change)

Good Practice: Monitoring and control of fulfilling social and environmental contractual criteria in Barcelona's nurseries

In the City of Barcelona, there are 103 nurseries (children aged from 0 to 3 years) gathering approximately 8,500 children, and are managed either by the Barcelona Education Consortium or the Municipal Institute of Education. These nursery schools serve around 8,000 meals a day (to both children and adults) and include breakfast, lunch and afternoon snacks prepared in the schools' own kitchens. In order to facilitate the monitoring and control of the commitment to the social and environmental contractual criteria, menus based on the Mediterranean diet are established by age groups (with a table of adaptations for intolerances or specific needs) for each day of the week. This makes it easier for the City Council to follow-up on a weekly basis through the use of various

tools. One of the tools that are used for monitoring are the monthly reports sent by nursery management, which evaluate the following aspects:

- Preparation or presentation of the food
- The quality of the products
- The portions/child ratio
- Communication between the coordinator/supervisor, company and school

The advantages of this monitoring system are that the schools themselves assess the service. Therefore, any non-compliance is quickly detected and the company is urged to remedy it. The control of delivery notes also enables to check if any products are received that do not comply with the offer. Non-compliance can lead to penalties for companies.

Operating plan and reporting criteria in the NL

The criteria set out by the Netherlands (<https://www.mvicriteria.nl/>) propose provisions requiring contractors providing catering services to **operate an improvement plan** within three months of the contract being awarded. The plan should include ideas for menu planning and demonstrate how improvements are achieved in the context of the contract and its Key Performance Indicators (KPIs). The contractor must apply SMART (Specific, Measurable, Achievable, Relevant, and Time-Bound) principles to describe how they will handle the KPIs during the contract term and continuously improve them. The KPIs are related to various aspects of the catering service such as range composition, protein transition, health, staff training, and packaging. The contractor must monitor and report on these KPIs during regular consultation cycles, and the progress and communication about sustainable catering will be discussed during the contract period as part of strategic consultations. The contractor is required to implement the operation and improvement plan throughout the contract term. The plan must address environmental impact, targets, and measures for achieving objectives in each of the specified areas, with specific indicators for each. The guidelines for targets are provided for various KPIs, and the contractor's commitment to staff training and sustainable practices is emphasised.

France – Ma Cantine: Policy monitoring

The EGalim law, which includes sustainable public procurement requirements, is monitored through a government portal known as MaCantine. Each contracting authority is required to input its results and has the option to benchmark its performance against others. The use of the platform requires time effort from the contracting authorities who have to manually input data regarding the purchases of organic and sustainable products, but it is one of two examples (the other being Slovenia) in Europe of requirements to monitor the implementation of the policy as a whole.

Labelling for canteens

- (Germany): Canteens that meet the standards can obtain a label.
- Brussels (Goodfood label).
- Denmark: Label for canteens that respects the recommendations.

Annex 3. Support to farmers, short supply chains and the “local dimension” for public procurement

The understanding of “local” in food system sustainability discourse merits its own in-depth analysis, as this entails reflections related to the European Union's commitment to free trade and the single market, which are out of the scope of this work. Within public procurement, this topic gains an additional layer of complexity as the procurement directives have at their core the principles of the functioning of the single market, such as non-discrimination. However, the inclusion of local food is seen as a priority by stakeholders, including national governments, as a way to relocalise food production, increase resilience and ensure a fair remuneration for farmers. Further detailed information on this topic is available in chapter 3.2.3.

The technical analysis showed how various MSs are implementing criteria aimed at promoting local food production through public procurement, with various approaches. In some cases, the criteria introduce a kilometre limit for the provenance of the food supply, which poses challenges with the core principles of the single market. These criteria would also not be completely scientifically sound, as Stein & Santini (2022) compellingly propose in their article on the supposed environmental benefits of local food. However, it is worth noting some examples from MSs, which develop the notion of local procurement as follows:

- FR: Encourage the sourcing of products from local food projects (Projets Alimentaires Territoriaux - PAT). The active PAT are registered in a national online dashboards.
- AT: Food should be procured from the region - Support of the project "Austria eats regional" (<https://www.nabe.gv.at/forum-oesterreich-isst-regional-arbeitspakete/>) Portal proposed to look up regional products: <https://b2b.amainfo.at/kulinarik/> ; <https://www.lko.at/>.
- PT: Food products from farms of farmers holding the “Family Farming Statute” (which is codified in Portuguese law: <https://faolex.fao.org/docs/pdf/por188696.pdf>).
- Other examples however (IT), are less descriptive in what they mean with local food and at times include maximum distance (in km) as the only criterion to describe what local food is.

To comply with the procurement directives, the EU Food Policy Coalition proposes some procurement best practices which can still strengthen the position of farmers in the supply chain and contribute to stimulate local food systems:

- 1) Pre-procurement market engagement: At the pre-procurement stage, bidders should be asked about their ability to source food products from small-scale farmers and which do not originate from factory farming. The importance to the contracting authority of including such producers and products in food and catering contracts, wherever possible, should be emphasised, and bidders asked about any perceived barriers to their participation (e.g. cost, volume or specification of food products, delivery times, etc.) so that these can be avoided in the procurement criteria/requirements. The impact of dividing the contract into smaller lots should also be discussed (e.g. according to food type), as this may encourage participation by smaller operators.
- 2) Reserving contracts or lots for producers who employ workers with disabilities or disadvantaged workers. Contracting authorities can choose to reserve a contract, or one or more lots of a contract, for bidders who employ at least 30% workers with disabilities or disadvantaged workers (e.g. in food production, processing, distribution, catering services etc) as set out in Article 20 of Directive 2014/24/EU. This can help to encourage the

participation of social enterprises and non-commercial organisations in public procurement, and the definition of 'disadvantaged workers' could potentially include small farmers if they are at risk of poverty.

- 3) Subdivision of tender into smaller lots or direct contracts: Dividing contracts into small lots is easier if the contracting authority is buying directly rather than awarding a contract to a wholesaler or intermediary. If the contracting authority is managing the kitchen rather than outsourcing catering service contracts, the best option might be to simply have different direct contracts for different primary agricultural products. Preferring seasonal primary food, at least partly corresponding to local culinary traditions and being attentive to biodiversity (e.g. different types/sorts of apples) can further support short supply chains.
- 4) Good practice: Dynamic Purchasing System (DPS) and online market platforms. Dynamic Food Procurement) refers to an innovative framework contract where qualified suppliers, particularly smaller producers, can join in at any time and supply just the quantity they produce. In practice, all qualifying suppliers are registered on a platform and participate in mini-competitions, according to procurement requirements and seasonality. Against a list of specific products to be delivered, registered suppliers submit their prices. DFP provides an open digital marketplace for food producers and buyers. By removing many of the barriers to entry for suppliers, a more balanced market can emerge, creating substantial opportunities for local producers and suppliers (see in the city of Ghent).
- 5) BioRegions: Organic Districts, also known as Bio-Districts or Eco Regions, are an innovative model of rural development where environmental sustainability and local development are in the foreground. An Organic District can be defined as "an area where farmers, citizens, public authorities, and other local actors realise a formal agreement aimed at the sustainable management of local resources, based on the principles and model of organic farming and on the agro-ecological best practices, in order to boost the economic and social and cultural development of their community". Sourcing food from Organic Districts can substantially contribute to increasing the consumption of organic food in the cities through the canteens and encourage the development of this sustainable territorial management model. Public authorities have a decisive role to play in the implementation of GPP from organic districts, especially when the purchasing of organic food from smallholders is addressed.

As procurement is often an integral part of the development of local food policies, a strong case should be made to align local procurement with those policies objectives. Participation in local food stakeholder networks, and in knowledge sharing and capacity building networks (such as Milan Urban Food Policies or others) can also be beneficial to contextualise the local issue.

Local food policies have been gaining a lot of attention in recent years, also through the financing of many Horizon Europe R&D projects specifically devoted to the development of sustainable local food policies and living labs in European cities. These projects are instrumental in operationalizing wider EU objectives in specific regional and municipal contexts and are providing stakeholders with resources to implement strategies, also related to food sustainability.

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