

The Consumer Voice in Europe

## ON THE ROAD TO SUSTAINABLE LIFE IN 2040: WHAT CONSUMERS NEED

BEUC REACTION TO THE EU COMMISSION'S 2040 CLIMATE  
TARGET COMMUNICATION



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## Introduction

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The European Commission's 2019 Green Deal for the first time recognised that the protection of the environment and the fight against the climate crisis were pre-conditions for peace and prosperity in the EU. As a result, the Commission put forward a vision that streams climate and environmental action into all policy fields. Resulting from this, also in consumer-relevant sectors, the EU adopted a series of ambitious regulations<sup>1</sup> (in the fields of energy, mobility, consumer products, industry, etc.) to align our economy more with our climate commitments.

As the EU elections are approaching and the mandate is about to wrap up, the European Commission presented its views for the follow-up to our climate policies. In a Communication presented in February 2024, the Commission recommended that the EU should agree on an intermediate 2040 target between those already set by the 2019 climate law (- 55% in 2030 and net zero in 2050). Together with this new indicative 2040 target - which will be discussed by co-legislators in the new European Commission and Parliament - this Communication explains how this 2040 objective should be reached across the different sectors of the economy: energy, food and agriculture, transport, industry, etc.

Although non-binding, this roadmap is a clear indicator of the possible future orientation of EU climate policies in fields of primary interest for consumers, such as mobility, housing and heating or diets.

Importantly, the Commission states that "the objective of this Communication is to launch the political debate and inform the preparation of the post-2030 framework". BEUC very much welcomes the opportunity to contribute to these crucial discussions.

In this paper, we highlight the positive aspects of the Communication for consumers, and signal where more efforts are needed to fully engage in this deep and much-needed transformation of our societies.

## 1. The Communication's main principles

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### 1.1. The positives

#### 1.1.1. Spot-on analysis of the urgency

The Communication's title "Securing our future" sets the right tone on how crucial stronger climate action is necessary to preserve the livelihood on our planet. Among the three policy options considered for the setting of the 2040 target, the European Commission rightly opted for the most ambitious one, i.e. a 90% GHG emissions reduction target for 2040. The Communication emphasises that acting as early as possible will make the transition more affordable and predictable. Conversely, "the more climate action is delayed, the greater human and economic consequences and the greater the need to fund restoration and adaptation". The Commission does not limit itself to this dire diagnosis and sees the glass half full: a well-designed transition can deliver benefits for Europe's economy and citizens.

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<sup>1</sup> For instance: the revision of car CO<sub>2</sub> targets, the Alternative Fuels Infrastructure Regulation, the recast of the Energy Efficiency and Renewable Energy Directives, the Ecodesign for Sustainable Products Regulation, the revision of consumer law ('Empowering Consumers for the Green Transition').

**BEUC fully stands behind this diagnosis and call for more urgent and ambitious action.** Already today, consumers increasingly foot the bills of extreme weather events which are accelerated by climate change. Without a significant acceleration of our action, climate hazards (extreme draughts, heat waves, flooding, etc.) that we are already witnessing today “could become catastrophic”, as the European Environmental Agency warns [in a recent report](#). Beyond the necessity to prevent these risks to materialise any further, we are also convinced that [climate action, if well-designed, is an opportunity for all](#).

Finally, the Communication’s spot-on call for more ambitious action stands in sharp contrast with the recent decisions to delay or suspend some key initiatives of the EU Green Deal, particularly in the field of food and agriculture. The Commission should ensure consistency between the Communication’s clear acknowledgment that stronger climate policies are urgently needed and its concrete action across policy fields. In the last couple of years, we have consistently taken position to explain [that pressing pause on the Green deal was not in consumers’ interest](#). The latest announcements rolling back on the Common Agricultural Policy or against the Nature Restoration Law are very worrying signals which go against the emergency described in this Communication or the recently published [one entitled “Managing Climate risks – protecting people and prosperity”](#).

### **1.1.2. Welcome emphasis on the need to roll out recently agreed climate and energy laws**

In the field of energy and climate, the European Commission has an excellent track record and managed in the past five years to pass very important legislations. They include the increase of our renewable energy and energy efficiency targets, the agreement to greatly accelerate the electrification of the European car industry and to fasten the roll-out electric cars’ charging stations, and an ambitious revision of the EU carbon market. The Commission’s Communication therefore rightly insists on the fact that achieving the 2040 target “will require the full implementation of the 2030 framework” and that the stability of the recently agreed climate and energy laws are a “pre-condition for the EU to stay on course”. In a recent interview with Politico, Climate Commissioner Hoekstra also reminded that more action would be needed after the EU elections.<sup>2</sup>

In the field of food, the EU has followed a piecemeal approach to advancing food sustainability to date. The result is a set of sectoral policies (on agriculture, health, trade, etc.) which lack coherence and are even contradictory at times. In its 2020 Farm to Fork Strategy, the European Commission announced a new legislative framework for a Sustainable Food System (FSFS). This now delayed horizontal law could have paved the way for a transition to a more sustainable food system operating within planetary boundaries. While the Communication clearly refers to the need of “policies addressing the food sector in a holistic way” and points out that agricultural activities play an important role in achieving the EU’s 2040 climate ambition, it fails to address meaningful policy measures to do so.

It is indeed crucial to remind policymakers and the broader public about the need to fully implement the recently agreed environmental, energy and climate laws at a time when a growing share of the political spectrum is campaigning on an anti-Green Deal narrative and sometimes openly calls to reopen directives and regulations which have just been agreed. Some political parties seem for instance to play with the idea of renouncing to the 2035 phase-out date of new petrol and diesel cars.

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<sup>2</sup> Politico, Zia Weise, ‘Europe must quicken green efforts after election, EU climate chief says’, 12 March 2024 (article behind paywall).

**BEUC stands firmly behind the full implementation of the recently agreed energy and climate laws**, and especially of the Fit for 55 package. Now is certainly not the moment to waste energy and time reopening recently agreed legislation or to cast doubt on the direction of travel. Policymakers from all sides should rather focus on adopting the necessary measures to deliver the benefits of these laws on the ground, targeting especially lower- and middle-income consumers. To take a concrete example, rather than discussing whether battery electric cars sales should represent 100% or 90% of new cars in 2035, policymakers should look into ways to accelerate the transition to battery electric vehicles and think of schemes offering quicker access to consumers for whom the upfront costs are still a major barrier (see specific section on mobility below).

## **1.2. The blind spots**

### **1.2.1. Missing the mark on making measures specific**

The Commission points out in the Communication that “more focus is [...] needed on a framework that ensures that all citizens benefit from the climate transition”. Further, the Commission regularly recalls the need for redistributive measures to address social impacts and ensure that “no one is left behind”. However, the Communication insufficiently includes tangible proposals on how to put this just transition in motion and what concrete measures and tools could make sure that consumers benefit as quickly as possible from the green transition.

While it is true that many redistributive policies fall under the responsibility of Member States, the Commission will probably need in future years to give stronger guidance to Member States. This could be the case for concrete measures to be funded under the Social Climate Fund or what new investment instruments could help overcome the upfront costs of the transition.

Also, we are convinced that new policies will be needed to push those market players who can bear more costs to engage earlier. For instance, we argue that corporate fleets should be mandated to go full electric well ahead of the 2035 phase-out date. This way, consumers will get a quicker access to electric cars on the second-hand market, which will benefit both their wallets and the planet.

### **1.2.2. No concrete measure to fix the consumers’ investment gap**

An entire chapter of the Communication is dedicated to “investing in our future”. Unfortunately, it does not contain any explicit reference to financial measures targeting individual households and consumers. This absence of concrete proposals to close the consumers’ “investment gap” stands in sharp contrast with the high level of detail on support needed for the industry. Most of the text indeed revolves around the huge investments that the European industry will need to navigate through the transition. It even contains very specific references to potential sources and amounts of funding.

While consumers, who are also workers, can only benefit from a thriving economy, we strongly regret that the investment gap which individual households face is given little attention compared to the industry. Most consumers have difficulties affording the upfront costs of the transition: purchasing an electric car, a heat pump or launching an energetic building renovation are all investments which pay back only after a certain time. To overcome the struggle of many households to invest in the first place, we need a mix of zero- or low-interest public grants (that are usually quickly disbursed) and a wider mobilisation of private finance. It will be important for future policymakers to dedicate much more energy to address this issue. Otherwise, the transition will remain a distant reality for most consumers for the foreseeable future, and this equates to the failure of the transition, to the detriment of all.

### 1.2.3. A major blind spot: very little mention of the need for lifestyle changes

The final 2040 target Communication misses one key aspect of the climate transition: the need to go for significant lifestyle changes in all areas of daily life. This is particularly striking in the chapter on food and agriculture and to a lesser extent in the one on mobility for which demand-side measures are either missing or only barely mentioned. This blind spot is problematic as science clearly states that technological improvements alone will not deliver the GHG emissions reduction that we need to reach the 2040 targets. This is even more of a missed opportunity as the Impact Assessment accompanying the Communication did touch upon the importance of demand-side driven actions (described as “societal trends”).<sup>3</sup> However, sustainable lifestyle choices are mostly described as individual actions, without detailing the necessary systemic changes that must incentivise them.

To become climate neutral, the EU will need much more profound measures, such as shifting our dietary habits or greatly reducing the use of individual fossil-fuelled cars. These measures should not be seen as only constraints or restrictions of individual freedoms.

#### Highlighting the benefits of the transition for consumers

Moving away from individual cars to public transport or active mobilities can greatly reduce mobility bills, free up precious time to spend with family and friends and make cities more liveable. Reducing meat consumption is proven to be very beneficial for our health. Policymakers should proactively highlight the benefits of these behavioural shifts.

As consumer groups, we know that individuals are much more ready for these changes than what the political debate would make us believe. Several surveys, such as last July’s Eurobarometer, underpin this. The key to foster acceptance is to make sure that citizens are given the means to shift their lifestyles and not just be imposed to do so without any proper accompanying measures. Rather than putting a veil on this reality, policymakers should face it and conceive policy measures which will deliver the progress we need, and make the sustainable option the easy, affordable, and attractive one.

## 2. Close-up on energy, mobility and food

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### 2.1. Energy

#### 2.1.1. The positive: a good focus on electrification and renewable energy

While the Communication sets out that “all zero and low carbon energy solutions” will be needed, it rightly insists that “solar and wind will make up the vast majority of renewable energy solutions” and that “electrification [...] is the main driver of the energy transition”. BEUC fully supports these statements. It is crucial to roll out as quickly as possible those decarbonized energy carriers that are market ready, the most efficient and, consequently the most affordable. We have continuously insisted to make a smart and targeted use of low-carbon technologies and avoid for instance using hydrogen for individual heating.

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<sup>3</sup> The LIFE scenario is a sensitivity analysis used as part of the policy options to “open the debate on the role of such [societal] trends in the context of meeting climate neutrality by 2050”. See: SWD(2024) 63 final (Impact Assessment Report – Part 1), page 29.

### 2.1.2. Where more details are needed

#### **Ensure the transition is affordable for consumers**

BEUC agrees with the Commission's optimistic outlook that the phase-out of fossil-fuel generation "may contribute to the lowering of wholesale electricity prices". Further, the Commission mentions that the need for significant investments to ensure proper electrification should not increase final prices for both consumers and the industry. Also, "avoiding excessive high network tariffs for end users" due to the development of the needed grid infrastructure "will be a key regulatory objective at the EU and national level". To make sure this happens, consumer groups insist that consumers should not foot the bill for the development of energy infrastructure for industrial purposes. This principle will need to be strictly applied when discussions will emerge for instance on the development of hydrogen infrastructure or the likely decommissioning of gas infrastructure.

While the Commission rightly insists that 'Energy Efficiency First' remains a major policy principle, the Communication lacks details as to how the ambitious energy efficiency and buildings renovation objectives recently agreed<sup>4</sup> could be implemented. One crucial make-or-break aspect is to address the financial bottlenecks of housing renovation. The Commission optimistically states that the recently agreed targets "will leverage private financing across all sectors and can unlock a European marketplace for energy efficiency investments". In the field of housing renovation, we strongly doubt that the financial market will deliver the appropriate financial tools by itself. It will therefore be essential that the next European Commission and Member States dedicate more attention and efforts to mobilising private finance so that financial institutions play their part in achieving our energy efficiency goals. This can be done through the development of innovative financial instruments<sup>5</sup>, such as on-bills or on-tax schemes and/or by the intervention of public authorities to de-risk individual households' investments (for instance through public guarantee funds). Many tools are already under development/available at national/local level. The objective should be to streamline them.

#### **Engage consumers in demand-side flexibility**

The Communication mentions that the electrification of our energy system needs to go hand-in-hand with the further development of smarter grids, system integration, demand flexibility and storage solutions. The Commission also insists that "consumers should be empowered to adapt their consumption to market conditions". While the potential benefits of demand-side flexibility are clear, strong political action is lacking to finally make these offers available to consumers.

EU Member States should for instance urgently accelerate the roll out of electricity smart meters which are a precondition for harnessing and rewarding consumers' flexibility. Moreover, while dynamic electricity price offers should theoretically be available in all the EU, they are currently offered to consumers in only 14 Member States. This is because many governments have not implemented the relevant provisions of the Clean Energy Package agreed in 2019. EU Member States must make these offers available to consumers and the European Commission should prominently include the need to develop demand-side flexibility in all relevant strategies, starting with the delayed Heat Pump Action Plan.

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<sup>4</sup> With the recast Energy Efficiency Directive and the Energy Performance of Buildings Directives.

<sup>5</sup> See BEUC checklist ['Filling the Investment Gap – allow consumers to finance their transition to a sustainable life'](#), August 2022.

## BEUC recommendations

**Spare consumers from financing future energy infrastructure which will mainly answer industrial needs.** They include the expansion of electricity grids, the repurposing of gas networks for hydrogen or the decommissioning of gas networks.

**Help consumers invest in sustainable solutions.** The European Commission and Member States should develop attractive public and private financial instruments (e.g. for renovation, sustainable mobility, energy efficient appliances) at individual level and develop a legal framework which allows consumers to contribute via their retail investments to the green transition at societal level. See our factsheet on filling the consumer “investment gap” here.

**Make flexible energy offers a reality.** The European Commission and Member States should finally make attractive demand-side flexibility offers available to consumers. It is high time all Member States transpose the relevant provisions of the Clean Energy Package.

## **2.2. Mobility**

### **2.2.1. The positive: right approach on road transport’s electrification**

The Communication recognises the central role of road transport’s electrification in meeting our climate targets and in bringing co-benefits, such as better air quality in cities. The Commission insists that the recently agreed CO<sub>2</sub> performance standards for cars will be critical in increasing the share of zero-emission vehicles. BEUC very much supports this vision and has been a very strong supporter of the historic decision to phase out the sales of new internal combustion engines by 2035. Electric cars indeed bring financial gains to drivers,<sup>6</sup> enabling a successful transition both for climate and consumers.

The Communication also rightly points out that “the renewable and low carbon fuel costs should not be underestimated” and suggests prioritising their use for the decarbonisation of the maritime and aviation sectors. BEUC fully supports this stance as direct electrification is proven to be much more beneficial for consumers than any other low carbon alternatives such as synthetic e-fuels or hydrogen. Some policymakers have been calling to seize the opportunity of the 2026 car CO<sub>2</sub> regulation review to allow the use of e-fuels in road transport. The Commission and Member States should resist this attempt which can only delay the transition to decarbonised road transport and make it more expensive for consumers. Low-carbon fuels and hydrogen, which are much less energy-efficient than electricity, will come in scarce quantities. Therefore their use should be prioritised in hard-to-abate transport sectors, which exclude road transport.

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<sup>6</sup> [BEUC study on the Total Cost of Ownership of Electric Cars](#), 2021.



### 2.2.2. Where more details are needed

#### **How to make access to electric cars easier for middle- and lower-income households**

In the upcoming years, specific measures will be needed to make electromobility a reality for consumers, especially lower- and middle-income ones. As for housing renovation or the purchase of heat pumps, consumers indeed face high upfront costs. What is more, the market offer is still largely inadequate with a too limited supply of small electric cars. Although the recently adopted car CO<sub>2</sub> standards will hopefully also help to boost the offer of smaller e-cars, the little to no supply of second- and third-hand EVs is likely to hamper a broader adoption until the beginning of the 2030s at least.

To tackle these issues, BEUC advocates for policy measures addressing the high costs of electromobility in the short to medium term via regulatory and fiscal interventions, with dedicated financial means. These policies - to be deployed at EU and national levels - include an electrification mandate for large private and public fleets, increasing the supply of second-hand EVs while alleviating the burden of upfront costs for consumers. Member States also need to roll out dedicated fiscal and tax incentives for small EVs such as the [social leasing scheme developed in France](#). Similar schemes can be put in place to renew the existing fleet with a conversion or retrofitting premium for older vehicles.

To fund these measures, consumers need a stronger mobilisation of private finance and the development of innovative, green financial tools specifically targeting lower-income households. The European Commission should develop guidance on these tools and suggest how the Social Climate Fund could be used to fund/co-fund a part of these measures.

#### **Systemic measures for a shift away from polluting to sustainable modes of transport**

The Communication only dedicates a few lines to the importance of increased rail use, stronger development of multimodal transport systems, better urban planning and the promotion of active mobilities. It is quite revealing that the Commission makes no single reference to the concept of 'modal shift'. While private transport modes, hopefully mostly battery electric vehicles, will remain an important part of consumers' daily mobility in 2040, the achievement of the EU's climate targets cannot happen without a much deeper transformation of our mobility system, away from individual to more shared and active modes of transport.

Along with an accelerated electrification of road transport, BEUC calls the Commission and Member States to dedicate much more efforts to offering consumers alternatives to individual cars for their daily mobility needs. The shift to rail must be a priority of the next Commission, who should adopt as soon as it takes office an 'EU masterplan for rail' with measures tackling investments in infrastructure, better ticketing, and stronger passenger rights. The development of rail infrastructure and the manufacturing of the rolling stock are long-term plans which need years before being rolled out. To increase rail use in the 2030s, ambitious action is therefore urgently needed now.

### BEUC recommendations

**Make electric cars a reality for consumers, with a focus on lower-income households.** Impose electrification on large corporate car fleets, set up dedicated fiscal and tax incentives for small EVs or mobility budgets focusing on lower-income households, make dynamic tariffs available for EV charging, incentivise the production and sales of smaller electric vehicles.

**Put the modal shift to rail at the heart of the EU's transport strategy:** adopt an ambitious "EU Masterplan on rail" comprising measures to: make ticketing and booking easier, invest in infrastructure, reduce ticket costs, coordinate railways' timetables with other modes, purchase rolling stock jointly, increase user convenience and passenger rights.

## 2.3. Food

The 2040 climate target communication fails to recognise the full potential of the food and agriculture sector in achieving EU climate neutrality by 2050. It half-heartedly recognises the role of dietary shifts in reducing emissions.

### 2.3.1. Untapped potential to cut agricultural emissions

The agriculture sector has a major impact on the climate, especially the livestock sector. [The European Court of Auditors](#) has found that despite large parts of CAP funds being attributed to climate action, this had little impact on cutting emissions<sup>7</sup> and most measures had a low potential to mitigate climate change. For instance, the CAP does not seek to limit or reduce livestock numbers and continues to support farmers cultivating on drained peatlands (representing 20% of EU's GHG emissions).

While the impact assessment on the 2040 climate target quoted the Climate Action Progress Report 2023<sup>8</sup> highlighting that "the lack of substantial progress" in agricultural emissions reductions called for a "gear change",<sup>9</sup> the Communication itself lacks quantitative objectives for cuts in emissions from agriculture, such as methane from livestock and nitrogen dioxide from soils.

Without tapping into the agriculture sector and the detrimental impact of the intensive livestock sector on climate, environment and health, the Communication ignores scientific advice on the overproduction and -consumption of meat and dairy which continues to drive up emissions.

In recent weeks, the green architecture under the CAP has been under attack. For instance, climate measures such as soil cover which previously were mandatory are now expected to be made voluntary. The European Commission rolling back on requirements that are scientifically-sound and based on rigorous impact assessments would in fact go against the objectives of the 2040 climate target and would risk jeopardising the long-term sustainability of our food systems.

<sup>7</sup> <https://www.eea.europa.eu/data-and-maps/figures/historical-1990-2020-and-projected>

<sup>8</sup> [https://climate.ec.europa.eu/document/download/60a04592-cf1f-4e31-865b-2b5b51b9d09f\\_en](https://climate.ec.europa.eu/document/download/60a04592-cf1f-4e31-865b-2b5b51b9d09f_en)

<sup>9</sup> SWD (2024) 63 final (Impact Assessment Report – Part 1), page 12.

### 2.3.2. Lack of measures to make lifestyle changes attractive and easy

Besides failing to address the full potential of production-side measures, demand-side measures such as lifestyle changes are missing from the Communication. Scientific literature has recognised the vital role lifestyle changes, including dietary shifts, play in reducing GHG emissions. Such shifts even lead to significantly higher emission reductions than for example technological improvements at farm level or cuts in food loss and waste.<sup>10</sup> The public consultation on the 2040 climate target shows that there is high support among EU citizens for dietary changes towards more climate-friendly diets (85%), yet the impact assessment points out that these changes in lifestyle and consumption patterns often require support from policymakers to change choice architecture and incentives.<sup>11</sup>

Although the impact assessment included a scenario (called LIFE) on the potential of a demand-side shift towards more sustainable lifestyles, incl. dietary changes, it regrettably did not make it to the Communication text. These additional demand-side measures - presented alongside three supply-side scenarios - could reduce the costs to society of reaching the 2040 target while bringing environmental and health co-benefits. While the LIFE scenario does not specify drivers for these shifts in consumption patterns, the impact assessment recognises the potential of food environments in creating and shifting dietary patterns.

More plant-based diets rich in vegetables, fruits, legumes, nuts, and whole grains and with 'less and better' animal products can benefit consumers' health, climate and the environment, and the welfare of farmed animals. Although consumers are ready to play their part, currently the healthy and sustainable option is not the easiest one for consumers. BEUC welcomes that the Communication recognises the role of the food industry in shaping food environments (i.e. the factors that influence consumers' food purchasing decisions) and "making healthier diets an accessible and affordable choice for consumers", which is a longstanding call from BEUC. Yet, the text falls short of announcing any new policy initiatives targeting actors from the middle of the chain to transform food environments - such as the much-needed Sustainable Food Systems Framework law.

For Europe to achieve its health, sustainability and climate targets, the healthy and sustainable, including climate-friendly food choice must become the most available, affordable, promoted and desirable option.<sup>12</sup>

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<sup>10</sup> A [recent study](#) even estimated that the adoption of more plant-based diets in Germany could lead to reductions in GHG emissions of 29-53% compared to a 2050 baseline - versus 5-10% only for technological improvements at the farm level, and 8-12% for reductions in food loss and waste.

<sup>11</sup> SWD (2024) 63 final (Impact Assessment Report - Part 4), pp. 51.

<sup>12</sup> European Commission, Directorate-General for Research and Innovation, Group of Chief Scientific Advisors, *Towards sustainable food consumption - Promoting healthy, affordable and sustainable food consumption choices*, Publications Office of the European Union, 2023, <https://data.europa.eu/doi/10.2777/29369>

### BEUC recommendations

**Recognise the potential of the food and agriculture sector to contribute to the EU's emissions reductions goals,** incl. demand-side measures such as dietary shifts, and quantitative targets to cut agriculture emissions.

**Transform food environments.** Ensure that the post-2030 policy framework that will be developed by the next European Commission to meet the 2040 climate target includes initiatives to change food environments so that sustainable healthy diets become more available, affordable, and attractive for consumers.

ENDS

