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AG 111  
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**COVER NOTE**

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From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
date of receipt:	9 July 2025
To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

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No. Cion doc.:	C(2025) 4607 final
Subject:	COMMISSION IMPLEMENTING DECISION on the request for registration, pursuant to Regulation (EU) 2019/788 of the European Parliament and of the Council, of the European citizens' initiative entitled "Food is a Human Right for All! Guaranteeing healthy, just and sustainable food systems"

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Delegations will find attached document C(2025) 4607 final.

Encl.: C(2025) 4607 final



EUROPEAN  
COMMISSION

Strasbourg, 8.7.2025  
C(2025) 4607 final

**COMMISSION IMPLEMENTING DECISION**

**of 8.7.2025**

**on the request for registration, pursuant to Regulation (EU) 2019/788 of the European Parliament and of the Council, of the European citizens' initiative entitled 'Food is a Human Right for All! Guaranteeing healthy, just and sustainable food systems'**

(Only the English text is authentic)

## COMMISSION IMPLEMENTING DECISION

of 8.7.2025

**on the request for registration, pursuant to Regulation (EU) 2019/788 of the European Parliament and of the Council, of the European citizens' initiative entitled 'Food is a Human Right for All! Guaranteeing healthy, just and sustainable food systems'**

(Only the English text is authentic)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2019/788 of the European Parliament and of the Council of 17 April 2019 on the European citizens' initiative<sup>1</sup>, and in particular Article 6(3) thereof,

Whereas:

- (1) A request for registration of a European citizens' initiative entitled 'Food is a Human Right for All! Guaranteeing healthy, just and sustainable food systems' was submitted to the Commission on 13 June 2025.
- (2) That request follows the request for registration of a European citizens' initiative entitled 'Food is a Human Right for All!' which was submitted to the Commission on 31 March 2025.
- (3) By letter of 29 April 2025 (C(2025) 2559 final), pursuant to Article 6(4) of Regulation (EU) 2019/788, the Commission informed the group of organisers that as regards the request for registration submitted on 31 March 2025, the requirements for registration set out in Article 6(3), first subparagraph, points (a), (d) and (e), of that Regulation were fulfilled and that Article 6(3), first subparagraph, point (b), thereof was not applicable. However, the Commission also explained that the initiative did not fulfil the requirement set out in Article 6(3), first subparagraph, point (c), of Regulation (EU) 2019/788. In particular, the Commission explained that some of the proposals of the organisers did not call on the Commission to submit a proposal for a legal act of the Union for the purpose of implementing the Treaties.
- (4) The Commission therefore informed the organisers pursuant to Article 6(4), first subparagraph, of Regulation (EU) 2019/788 that they could either amend the initiative to take into account the Commission's assessment, or maintain, or withdraw, the initial initiative in accordance with Article 6(4), second subparagraph, of Regulation (EU) 2019/788.
- (5) On 13 June 2025, the group of organisers submitted an amended initiative.
- (6) The aim of the amended initiative as expressed by the organisers is to call on the Union 'to make the right to food a reality and integrate it into' the Union legal framework that impacts 'the right to food in the EU and abroad'. The organisers consider that the Union 'must guarantee the right to food systemically and promote healthy, just, humane and

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<sup>1</sup> OJ L 130, 17.5.2019, p. 55, ELI: <http://data.europa.eu/eli/reg/2019/788/oj>

sustainable food systems'. To achieve these goals, the organisers set out fourteen specific objectives calling for the proposal or amendment of Union legal acts in these areas: (i) 'Fair food systems and democratic governance'; (ii) 'Support to national social protection initiatives'; (iii) 'Recognizing that agricultural products and foodstuff are not ordinary commodities'; (iv) 'Support to peasant agroecology and territorial food systems'; (v) 'Combating agricultural land's concentration'; (vi) 'Support to peasant seed systems'; (vii) 'Strict regulation of GMOs, including those obtained with new genomic techniques'; (viii) 'Sustainable water management'; (ix) 'Strengthening of animal welfare'; (x) 'Support to fruit and vegetable consumption and regulation of ultra-processed foodstuff'; (xi) 'Sustainable food procurement'; (xii) 'Meaningful food labelling'; (xiii) 'Stopping food waste'; (xiv) 'Strengthening of the right to food in third countries'.

- (7) An annex to the amended initiative provides further details on its background, its subject matter and its objectives. It states that the right to food is 'guaranteed when everyone has dignified access to adequate food on a sustainable basis' and lists different measures that could be relevant to the objectives of the initiative. An additional document reproducing the initiative details has also been submitted by the organisers as part of their registration request.
- (8) As regards the first, fourth, fifth and sixth objectives of the initiative, the Commission could adopt a proposal on sustainable and fair food systems; a proposal to support peasant agroecology and territorial food systems; propose actions relating to the improvement of gender equality in agricultural jobs and generational renewal; and propose a regulation to support the autonomy of peasant seed systems respectively, on the basis of Articles 38 to 44 of the Treaty on the Functioning of the European Union (TFEU).
- (9) Concerning the second objective, at this stage it cannot be excluded that the Commission could adopt a proposal to support and complement the activities of the Member States for the social protection of workers and/or the combatting of social exclusion and/or the modernisation of social protection, on the basis of Article 153(1)(c), (j) or (k) TFEU, insofar as the risks of food security can be related to minimum income.
- (10) Similarly, as regards the third objective, it cannot be excluded at this stage that the Commission could adopt a proposal for a legal act to recognise that agricultural products and foodstuffs are not ordinary commodities on the basis of Articles 38 to 44 TFEU.
- (11) As regards the seventh objective, the Commission could adopt a proposal to regulate GMOs on the basis of Articles 43, 114 and 168(4)(b) TFEU.
- (12) Concerning the eighth and thirteenth objectives, the Commission could adopt a proposal on sustainable water management and a proposal on food waste respectively, on the basis of Articles 191 and 192 TFEU.
- (13) As regards the ninth objective, the Commission could adopt a proposal to strengthen animal welfare on the basis of Article 43(2) TFEU.
- (14) Concerning the tenth objective, the Commission could propose incentive measures for actions that promote healthy and sustainable diets on the basis of Article 168(5) TFEU.
- (15) As regards the eleventh objective, at this stage it cannot be excluded that the Commission could adopt a proposal on sustainable food procurement on the basis of Article 114 TFEU.

- (16) Concerning the twelfth objective, the Commission could adopt a proposal on food labelling on the basis of Article 114 TFEU.
- (17) Finally, concerning the fourteenth objective, at this stage it cannot be excluded that the Commission could adopt a proposal to strengthen the right to food in third countries on the basis of Articles 207, 208 and/or 212 TFEU.
- (18) For those reasons, the Commission considers that none of the parts of the initiative manifestly falls outside the framework of the Commission's powers to submit a proposal for a legal act of the Union for the purpose of implementing the Treaties.
- (19) That conclusion does not affect the assessment of whether the concrete substantive conditions required for the Commission to act, including compliance with the principles of proportionality and subsidiarity and compatibility with fundamental rights, would be met in this case.
- (20) The group of organisers has provided appropriate evidence that it fulfils the requirements laid down in Article 5(1) and (2) of Regulation (EU) 2019/788 and has designated the contact persons in accordance with Article 5(3), first subparagraph, of that Regulation.
- (21) The initiative is not manifestly abusive, frivolous or vexatious, nor is it manifestly contrary to the values of the Union as set out in Article 2 of the Treaty on European Union or to the rights enshrined in the Charter of Fundamental Rights of the European Union.
- (22) The initiative entitled 'Food is a Human Right for All! Guaranteeing healthy, just and sustainable food systems' should therefore be registered.
- (23) The conclusion that the conditions for registration under Article 6(3) of Regulation (EU) 2019/788 are fulfilled does not imply that the Commission in any way confirms the factual correctness of the content of the initiative, which is the sole responsibility of the group of organisers of the initiative. The content of the initiative only expresses the views of the group of organisers, and can in no way be taken to reflect the views of the Commission,

HAS ADOPTED THIS DECISION:

*Article 1*

The European citizens' initiative entitled 'Food is a Human Right for All! Guaranteeing healthy, just and sustainable food systems' shall be registered.

*Article 2*

This Decision is addressed to the group of organisers of the citizens' initiative entitled 'Food is a Human Right for All! Guaranteeing healthy, just and sustainable food systems', represented by Olga KIKOU and Almudena GARCIA SASTRE acting as contact persons.

Done at Strasbourg, 8.7.2025

*For the Commission*

*Maroš ŠEFČOVIČ*

*Member of the Commission*

