

**MÜNDLICHE STELLUNGNAHME vom 18. September 2025 beim informellen Briefing für die Mitglieder des Ausschusses für wirtschaftliche, soziale und kulturelle Rechte (Deutschland-Arbeitsgruppe):**

Verfasst von Saskia Richartz (Ernährungsrat Berlin) im Namen des Netzwerks der Ernährungsräte und zwölf weiterer unterzeichnender Organisationen:

Dear Committee Members

Thank you for the opportunity to present on the issue **of compliance with the right to food**. Our submission is carried by **13 organisations**, including those present here today: **the German network of food policy councils; the German poverty network and the German alliance on climate change and health**.

To start with, I would personally like to acknowledge that it is difficult to focus on domestic implementation – in the face of the acute and catastrophic situation in Gaza – and the inadequate response from our government. However, as a baseline, I do think that the German public can only learn to respect the right to food of others, if it understands and sees commitment to the right to food in Germany.

Therefore, our priority request to you today is to **enquire whether Germany has established the appropriate co-ordination and governance mechanism** to monitor food insecurity and to address implementation gaps on the right to food across ministries and sub-federal levels.

We have some underlying concerns that are symptomatic of all six issue areas that we covered in our submission.

**Firstly, the government and its institutions have not only failed to adequately respond to previous (CESCR) Committee recommendations, they are also failing to adhere to their own scientific advisory body**, which has repeatedly highlighted concerns in relation to rising food poverty rates in Germany and has made concrete proposals for solutions that would increase access to healthy foods, most notably in relation to effective school meal programs and the affordability of food in low-income households. The advisory body has explicitly called for a governance mechanism.

**Secondly, the government has also failed to heed recent consensus recommendations of a representative citizens assembly**, which was **mandated** by the German Parliament to develop reform proposals that would be carried by a large public majority. The assembly recommended free school meals and restrictions on marketing of unhealthy products, amongst others.

**We are alarmed by the rising food insecurity and dismayed by the** government's active refusal to establish **an interministerial mechanism on food poverty and the right to food** during the adoption of the federal food strategy and the recent federal health reform.

The government should be asked to provide **tangible evidence for progress in committing financial resources and setting in place the appropriate statutory provisions** to reduce the number of people dependent on charitable food hand-outs and increase the share of children that are served school meals in accordance with the standards set by the German Nutrition Society.

We further invite you to ask **what mechanisms of redress and accountability are available to people – in particular those** whose rights to adequate food might have been violated by the inadequate food provisions in public or private institutions such as schools, hospitals, care homes, shelters, refugee and accommodation centres, prisons etc.?

Last but not least we urge you to investigate whether effective measures will be set out by the government **to protect rights-holders** – including farmers, small-scale food producers and consumers – from the negative impacts of **market dominance, price strategies, land-grabbing and advertisement power** of the food retail and processing sector.

In summary, our submission raises **two prior issues** that remain of concern, despite previous (CESCR) Committee recommendations – **notably inadequacies in social welfare payments and school meal programmes**. We also echo concerns raised by other submissions on securing an overall adequate and dignified standard of living.

We further raise **four new issues** relating to:

- the lack of governance mechanisms;
- inadequate food in health and care institutions; and
- inadequate protection of consumers and small-scale producers from the influence and interests of third parties.

I thank you for the opportunity to submit our concerns and remain at your disposal for any questions you might have.