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1. Introduction

Under the aegis of the European Union (EU) Common Agriculture Programme (CAP) the '*Food Aid Programme to the **Most Deprived Persons** in the Community*', commonly known as the MDP programme, ran from 1987 to December 2013. At its peak the budget was €500 million Euros, one per cent of the total CAP budget or 0.4 per cent of the total EU budget (2010/11 figures). The programme was delivered through voluntary agencies within EU member countries, although coordinated at a country level by government departments. The scheme was voluntary on behalf of member states and a number of member states did not partake of the fund.

This article explores the history of the program, the way it was constructed including its roots in the CAP, the delivery of the program across and within member states and the tensions in its operation as an agricultural policy and its eventual replacement with a new fund. Developments over the time of its operation such as the move away from and reliance on surplus foods, legal challenges to the programme and its replacement are all examined within a policy context. The implications of the ending of the MDP in 2013 and its replacement with a new fund, in 2014, are set out. The new programme which started in 2014 the Fund for European Aid to the Most Deprived (FEAD) is discussed and the implications for the next 6 years discussed (Official Journal of the European Union, 2014). This latter process is set out tentatively as the FEAD programme has only been in formal operation since March 2014. Tracing the development of such a policy or programme as the MDP is important as it allows

us to understand the shifts in policy and contribute to the development of new integrated food policies and apply lessons to the new FEAD programme.

2. Methodology

This is a piece of policy based research using reports and documents from the MDP programme, EU policy documents as well as submissions and reports from NGOS involved in the area of food poverty in Europe such as the European Public Health Alliance (2010 and 2013) and the European Federation of Food Banks (2015) (see <http://www.eurofoodbank.eu/portail/>). There is a dearth of academic papers on the MDP, with some mentioning it only as a backdrop to food aid (Santini and Cavicchi, 2014). Key among the documents drawn on were the annual MDP mini-conferences where participating countries and organisations made presentations. The author was present at some of these meetings. These were gathered and arranged chronologically. The majority of MDP documents were available on the EU Dg Agri website, since the end of the programme in 2013 these documents have been archived and are not as accessible or visible as they previously were.

Analysis of data in this research drew on two analytical approaches: Walt and Gilson's (1994) health policy triangle and Kingdon's (2010) policy streams model. The policy triangle was used as an organising framework to analyse how the Plan was developed and who was involved in its development (see figure 2). The policy triangle approach explores the role of actors informed by context, process and content of policy development, and enables a generalized map of a policy area to be developed to aid systematic thinking. This structure was used

to organise and filter the documents gathered above, first chronologically, then based on actors and stakeholder interests and positions. As Walt et al observe, policy analysis is a multi-disciplinary approach 'that aims to explain the interaction between institutions, interests and ideas in the policy process' (page 308). It is also multi-level in that interests and institutions operate at different levels in the policy world, from local to national. This can be seen in terms of the tension between various EU institutions, civil society groups and national governments.

The policy triangle (Walt and Gilson, 1994; Buse, Mays and Walt, 2012) was used as an organising framework. The policy triangle approach, looks at the role of actors informed by context, process and content of policy development (Walt and Gilson 1994; Walt 1994). This paper analyses the how, why and who (which actors) were involved in the formation of the MDP programme and made contributions to the policy including the new replacement programme (FEAD). The triangle acts to provide a generalized map of a policy area that can aid systematic thinking and analysis (Buse, Mays and Walt, 2012). This model was augmented using Kingdon's (2010) policy streams model. In this he argues that before a new policy can be developed and implemented, three different policy streams need to converge to create an active policy window – these are problem, policy and politics. These were used as frames of analysis in relation to each of the areas of context, process and policy development. Using Kingdon's model as a frame for analysis allows the context of policy development to be accounted for, so what was happening beyond the formal policy making in terms of the politics- and economics- of the time and were thus influential in developments of

the policy. This does not necessarily mean that the desired policy decisions are always reached, but that we can look to underlying influences beyond evidence in the process of food policy making

The findings are set out under the headings of background to the programme including key actors; the changing political and policy contexts; where policy streams collide and challenges to the MDP programme.

3. Findings

3.1 Background to the MDP programme: Content & Primary actors

The background to this programme can be found in the differing welfare provision across Europe at the time of the formation of the then European Economic Community (EEC) and the expansion of the Union to 12 states in 1986, it now incorporates 28 countries, with the last Croatia joining in July 2013. The history of the programme is rooted in the surpluses and food mountains of the 1970s and 1980s in the then EEC. Following poor weather in 1986 the programme was established to address the results of food price increases for European citizens. The programme was conceived as an instrument under the first pillar of the Common Agricultural Policy (CAP) (Knudsen, 2009). CAP was based on two pillars, the first encompasses market and price support mechanisms; the second is the rural development strand which has been extended in recent years to include agri-environmental aspects of sustainability. The scheme was mainly a way of reducing intervention stocks through redistribution to the poor and needy.

Because of its links with the Common Agriculture Policy the scheme was administered through the Directorate General of Agriculture now called the DG Agriculture and Rural Development or DG Agri for short.

The problem with food surpluses was what to do with them, and while some foods could be stored others were turned into alcohol or composted. The remaining surplus foods needed to be used in way that did not distort markets by lowering prices and distribution to those in need was seen as a means of achieving this. The recipients were groups whose purchasing power was limited and were unlikely to be major food consumers.

All this has its roots in the construction of the CAP in the original EEC, where one of the key pillars of the CAP was an equalisation of wages between rural and urban areas (Knudsen 2009, Garzon, 2006; Greer 2005). Reforms of the CAP have resulted in fewer mountains of food and surplus stock. These changes led to the need for reforms to the MDP programme in 2008 can be seen in table 2 and are discussed below. The other often unspoken agenda was that it was a contribution to stabilising farmers' incomes albeit that the initial scheme simply removed food from existing interventions and surplus stocks so that there was no possibility of it being sold on the open market and further deflating prices (Knudsen, 2009).

Of course, CAP itself is an anomaly, originally established as a means of levelling out rural/urban income levels and with a clear social conscience; it has become overtime a means of supporting an agro-industrial complex with the main

beneficiaries being large corporations and farmers. The impact on small and subsistence farmers is minor (Knudsen, 2009). The MDP programme and its take-up by countries were not related to the level of an existing successful food sector in that country, in fact many of the countries, such as Ireland and France, who made use of the programme have successful export and trade sectors (Grant, 1997), thus suggesting that there can be gap between a system of agricultural production and food security for the population of that country.

Table 1 List of key actors

Insert table 1 about here.

Actors were identified using the tripartite approach to food supply advocated by Lang and Heasman (2004) of civil society, the private sector and government. Table 1 shows a list of key actors and what is interesting is that in the period up until 2010/12 there were no obvious private sector actors. Private sector actors only became visible in the period where the food bank movement became highly visible and numerous following the 2007 global financial crisis. The private sector often appear, after this time, as partners with national food bank agencies, in their role in donating food. Santini and Cavicchi (2014) identified over 2500 private sector organisations in Italy contributing food to food banks. This developing feature of the private sector as an actor in food aid was also highlighted by Garrone, Melacini and Perego (2014).

At the time of its establishment in 1987, it was decided to deliver surplus foods in member states through non-governmental aid agencies on the basis that these

had existing infrastructures and distribution channels within countries and because they were already in contact with the most needy. There was, and remained, a bias towards this type of distribution. The reasons for this were a mix of historical and cultural factors, some of the original countries of the then EEC already had in place food welfare systems through state mechanisms, aid agencies often has exiting outlets for the distribution of food to the poor and needy thus there was no need to establish a new infrastructure. Some countries did not think it appropriate to rely on charities and the NGO sector to tackle the root causes of food poverty and insecurity (Cochrane, Clarke and Gewirtz, 2002). Additionally at the time, in 1987, the most needy were often those who fell outside the formal state systems of welfare such as homeless and migrant groups, to whom the non-governmental food aid agencies were judged to be better placed to deliver aid.

Some agencies and NGOs considered the operation of the MDP to constitute a social program within CAP and argued that CAP should be reformed around social and public health issues (Caraher, 2009; Gastein Opinion, 2002; Zahrnt, 2008; European Public Health Alliance, 2010 and 2013). The officials responsible for the scheme in DG Agri, over the years, argued that the scheme was an economic intervention scheme and not subject to the Amsterdam treaty provisions where this could be regarded as a social or public health intervention (European Communities, 1997; Caraher 2009).

The programme was based on voluntary participation of Member States, there were 19 participants in the 2008 plan, 20 in the 2012 delivery plan (EU

Commission 2012a). These included Belgium, Bulgaria, Czech Republic, Estonia, Finland, France, Greece, Hungary, Ireland, Italy, Latvia, Lithuania Luxembourg, Malta, Poland, Portugal, Romania, Slovenia and Spain. In previous years other Member States like Denmark and UK participated in the Programme but withdrew (Köhler et al, 1997). This was at a time of economic buoyancy before the financial and food crisis in 2007 (Lang, Barling and Caraher, 2009). The concept of the most deprived persons in the 1980s and 1990s was embedded in notions of those who were most deprived were outside of the formal welfare systems within nation states. Some Nation States objected not to the scheme itself but the imposition of the scheme and the lack of subsidiarity. This latter issue was a particular concern of the UK government and again became an issue with the ending of the MDP scheme and its proposed incorporation into a wider social welfare fund (Hansard 2012).

Table 2 Key dates in the MDP programme, identifying key issues, actors, processes and policies

Insert about here

3.2 Context of operation including policy formation

As has been noted the MDP was established after a poor harvest in 1986 and the existence of food surpluses due to intervention stocks being held back from the market so as not to lower prices. The legal basis for the MDP was Article 33 (1) (c) of the Amsterdam Treaty which sets out the CAP objective 'to stabilise markets'. It was further justified by Article 33 (1) (e) 'to ensure that supplies reach consumers at reasonable prices' (European Communities 1997). This

emphasis is important and will become an issue for policy streams colliding later on, the programme was conceived as an economic and not a social intervention by the officials responsible for the original organization of the scheme (Caraher, 2009). This system of using intervention stocks continued until 2008 when the Commission drew up a new legislation proposal, which allowed purchases of food on the open market (see table 2). This was because reform of CAP had ensured that the surplus stocks available had dwindled (Garzon, 2006) and those that remained did always meet the demands of a healthy diet. Because of this, the budget increased to €300M in 2008 and €500M for in 2009 and was planned to increase to €550M in 2013. The operational restrictions were that food should be bought on the open market within the EU and the focus was to be on fruit and vegetables. Part of this increased allocation can be accounted for by the increase in commodity prices, which have risen by up to 20 per cent since 2007, due to the global financial and oil crises and diversion of food crops to biofuel conversion. The expansion of the budget from €300m to upwards of €500 million did not represent an increase in funding per recipient but reflects increases in EU membership and states drawing on the resources, global food prices and demand with more users of the service.

It is estimated that the MDP scheme in 2012 provided food aid for 18 million people living in poverty in 19 EU Member States (EU Commission, 2012 and 2012a). Despite the budget increases this on average only provides €5.83 euro/person. Feedback from participating countries in recent years has indicated that there has been a shift in the recipients of the food aid which coincides with the global economic crises originating in 2007 (Schanbacher,

2010; De Schutter, 2011). Many of the charities involved in the distribution have indicated that the major recipients, up to the financial crises in 2007, were those who did not qualify for national welfare programmes, such as migrants/asylum seekers many of whom did not have full access or rights to national welfare schemes. The financial crises in the Eurozone has resulted in an increase in those in employment but on low incomes seeking food aid. There is no official EU detailed data on use of the scheme except that the numbers experiencing food poverty are on the increase and that the numbers receiving aid from the charities who distribute it are increasing (see European Federation of Food Banks website for more details <http://www.eurofoodbank.eu/portail/>, 2015). The EU Commission (2012a) report on impact assessment does say that the multiplier effect of the programme runs between a two and threefold effect. This was mainly through the mechanism of being able to leverage and seek matched funding and foodstuffs from both government agencies and the private sector combined with lowering costs through the use of volunteers.

3.3 Challenges to the MDP as a social programme: Policy Streams Collide

As noted earlier, EU officials in DG Agri always maintained that the scheme was an economic intervention scheme and not a social or public health intervention and therefore not subject to the Amsterdam Treaty provisions and public health requirements (European Communities, 1997). However, several Member states, notably Germany, had been critical of the program as they viewed it not as an economic intervention under CAP but as a social programme, others such as the UK were critical because of the joint funding and the principle of subsidiarity (Hansard, 2012). Table 2 contains details on some of these changes over time.

Article 2 Point 2 of Regulation 3149/1992 said *'Before drawing up the annual plan, the Commission shall consult the major organizations familiar with the problems of the most deprived persons in the Community'* (European Communities, 1997). As part of this process of consultation, in 2008, Germany officially challenged the extension of the programme and the extension of the budget to purchase goods on the open market. The move from a programme within CAP which traded in agricultural surpluses across member states was contained and not all that visible, the move to providing direct financial resources to purchase goods on the open market exposed the scheme to scrutiny and took it beyond the confines of the CAP regime. In policy terms, the allocation of additional monies to buy food on the open market, exposed the policy to scrutiny (Kingdon, 2010). This resulted in a challenge, from Germany supported by Sweden, to the development of the programme and its power to purchase commodities on the open market. The German government had long harboured doubts about the legality of the programme under CAP. The challenge shows the confluence of the various factors such as problem (economic crises), politics (member states see policy as operating outside its remit) and policy (proposed changes to buying on the open market). The proposed changes to the operation of the MDP programme (content and context according to Buse, Mays and Walt, 2012) allowed an appeal to be lodged (process, -Walt, 1994) on the basis of a long-standing dissatisfaction of some member states with the policy (Official Journal of the European Union, 2009).

This appeal resulted in the European Court of Justice (see table 2) upholding the complaint by Germany that the extension of the programme to purchase goods

could not be justified as part of the common agricultural policy and consequently had no basis in community law (European Commission 2012 a). The ruled that because the program was '*no longer used for removing surpluses*' (intervention stocks are close to zero) '*the link to agriculture policy had become tenuous*'. The ruling was that food supplies under the scheme should only be sourced from public storage. Subsequent Commission proposals for a revised scheme were blocked in Council by Germany, Denmark, the Netherlands, Sweden, the Czech Republic and Austria.

When the programme was declared non commensurate with EU law in 2011 by the European Court of Justice, the immediate proposal was to reduce the budget (back) to €134 million which represented the 30 per cent spent on intervention goods in 2010 (European Public Health and Agriculture Consortium, 2012). The majority of the allocated funds (average 70 per cent) were used to purchase food products within the European Union on the open market and the remaining money spend on transfer of surplus stock from one country to another (adapted from EU Commission 2012 and 2012 a). So €352,657,991 out of €500,000,000 allocated was spent on the open market.

The ruling by the European Court of Justice led to numerous representations from EU civic society groups, public bodies and appeals to MEPs to save the programme, see table 2. The EU Parliament in a July 2011 resolution called for a transitional solution to save the scheme. The outcome was an update of the regulation (agreed without a vote), which made it possible for the scheme to purchase food on the market, but only until the end of 2013 (European

Commission, 2012 a). After this date the establishment of a new social welfare Fund of €2.5 billion (European Commission, 2012 a) was proposed to replace the MDP programme. The new fund, the European Social Fund (ESF), is a cohesion policy justified by Article 174 of the Amsterdam Treaty which allows the Union to promote overall harmonious development by pursuing economic, social and territorial cohesion. The basis for EU level action was justified by the increase in the numbers in poverty within the Union (Eurostat, 2013). Food poverty is mentioned in the document but how priorities would be set are unclear. The document identified the problem that food poverty and more general cohesion issues cannot be solved at an EU level but must be driven by member states. The impact assessment document and the proposal (European Commission, 2012, 2012 a) pointed out that the new fund will require a level of co-financing. The ending of the MDP programme in 2013 had worrying implications for many charities and nation states who rely on the programme to take pressure off existing food welfare provision and add value to existing nation state welfare provision.

Intensive lobbying in 2012/13 and a general realisation that the global economic recession had resulted in rising levels of food poverty in Europe led to considerations and discussions over the development of a new Fund for European Aid to the Most Deprived (FEAD). This was envisaged as providing material assistance in the form of clothing and food to help the most deprived integrate into society. It was foreseen that this would operate and complement other EU policies such as the European Social Fund (ESF) and be able to take advantage of return to work schemes offered by the ESF. The implications of this

new programme are addressed in the discussions below. FEAD support was designed to help people take their first steps out of poverty and social exclusion and to help the most deprived groups and individuals by directing help towards their most basic needs, which is a precondition for them to be able to get a job or follow a training course such as those supported by the ESF.

4. Discussion

The MDP programme was set up not as the main or single way to tackle food poverty/insecurity in the European Union with 125 million at risk and 50 million suffering severe material deprivation (Eurostat, 2013), it was at best devised as a way of helping the most deprived and supplementing existing food welfare provision. In the years before the current global economic crises, the most deprived were judged to be those on the margins of society such as the homeless, immigrants and asylum seekers. Many of these latter groups often fell outside the formal welfare systems of nation states. The MDP regulations did not specify or define the most deprived persons, leaving Member States and distribution agencies to set their own targets. The role of the MDP programme in alleviating poverty was one of the issues taken up by public health bodies such as the European Public Health Alliance, yet the place of the programme in the overall scheme of poverty alleviation was never really considered. At the height of its operation there were repeated calls for the MDP programme itself to build standards specifically in the following areas:

- To focus on being part of the solution to eradicate food poverty not just deliver food aid.

- Creating synergies with national food aid programmes and community food projects that target food poverty.
- Ensure high nutritional quality and cultural acceptability of foods sourced so for example by using more fruit and vegetables and setting standards for a healthy basket of food to recipients.
- Make better use of funding by placing focus on certain at risk groups – homeless, maternal women and infants and linking these to national policies.

(Sources: European Federation of Food Banks, 2013; European Public Health Alliance 2010 and 2013; European Public Health and Agricultural Consortium, 2011).

The failure to address the above issues can be partially accounted for by its funding source and co-ordination by DG Agri, where such considerations would have been tantamount to admitting its social and welfare role, the very issues which eventually led to the formal challenges and demise of the programme. The situation where problem (food aid), policy (economic or social intervention) and politics (legal challenge to operation of the scheme) collide and conflict.

The organisations that delivered the food to recipients were, in the main, charities and faith groups not national governments. These included groups ranging from actors such as, Red Cross, Caritas, Eurodiaconia, Salvation Army, Restos du Coeur to Secours Populaire in France. In more recent years the main distribution outlet has been through food banks. Some of these used the food from the MDP programme to supplement their other sources of food, such as

waste/surplus food or charitable donations and to leverage donations from other sources such as the food industry. The rate of return was threefold on such by using such organisations, this was because the organisations used the MDP to leverage and encourage other donations as well as relying on voluntary labour to deliver services (EU Commission 2012a). As rates of poverty and hunger increase charitable and voluntary responses grow (Poppendieck, 1999; Köhler et al, 1997). For some food aid is judged to be best distributed through voluntary and charity organisations (Himmelfarb, 1985). Projects and initiatives through which the food is delivered to recipients include food co-ops, community cafes, cooking and nutrition programmes, farmers markets, breakfast or lunch clubs, school food provision, peer training, and any project which works to improve people's access to healthy, affordable and sustainable food. These were used as conduits for the distribution of food from the MDP. While all these were all welcome additions to the cannon of activity they find it difficult to address the long-term issues of food insecurity/poverty and financial insecurity (Caraher and Cavicchi, 2014). The context and process of delivery precluded participating national governments and those delivering the food aid of having to examine the wider issues of the MDP programme and its contribution, or otherwise, to national food security. Day-to-day survival and delivery of services that fill the gap in public sector provision, mean that groups delivering food aid seldom make the move from being responsive to being strategic (Winne, 2009; Lupton, 2011; Saul and Curtis, 2013). This is because the work they are engaged in is very demanding and responsive.

It is clear that the MDP programme over the period of its operation, from 1987-2013, provided little more than emergency or additional food aid for those most in need, a group that is increasing and expanding to include those in employment but on low-incomes as the economic crises bites (EU Commission, 2012a; Caraher and Cavicchi, 2014). Yet many of the organisations in receipt of the food became highly reliant on it as it provided a buffer and allowed them to leverage other contributions on the basis of it. When the ending of the scheme was proposed this led to many of these organisations lobbying for its continuance or replacement. The ESF as it did not have a dedicated food element was not considered to be adequate to fill this gap. Intense lobbying and a realisation by all that Europe was facing a crisis unprecedented since the 1930s led to the development of a replacement programme -the FEAD.

It still remains that charity of any kind is at best a temporary solution to food poverty/insecurity and the use of such outlets not a long-term solution from nutritional or equity perspectives (Lupton, 2011; Riches, 1997 a, b & c; 2011). While many definitions of food security have a strong emphasis on access (Food and Agricultural Organization of the United Nations (FAO), 2011), other definitions extend this to include the ability to acquire acceptable foods in socially acceptable ways, and “ a sustainable food system that maximizes self-reliance and social justice without resorting to emergency food sources” (Holben, 2010). So while food aid through programmes such as the MDP may have been welcome they ran the risk of distracting attention away from the causes of poverty and insecurity. By using distribution channels such as food banks and other charitable outlets to leverage extra donations there is the

danger of depoliticizing hunger by de-emphasising the role of the state (Riches, 1997 b,) has raised concerns with the way food aid activities are delivered – arguing that distribution of food aid through food banks and charities can depoliticize food and food poverty: *‘[T]his is precisely what government wishes to hear and it helps them promote their argument that it is only in partnership with the community that the hunger problem can be solved’* (page 70). So distribution of food through charities carries three risks. The first is that governments are now off the hook as responsibility for food welfare lies with the charity and NGO sectors. The second, is that such approaches normalise food aid and move it from a ‘citizen right’ to one of philanthropy. Finally the scale and ways that charities operate means that they cannot always guarantee that available food meets healthy eating guidelines. ‘Food aid’ is not a sustainable solution to food poverty and insecurity, and the MDP programme, the Parliament & Commission as well as member states could have worked towards more sustainable solutions that improve access to healthy foods for Europe’s poor.

Articles 152 and 153 of the Amsterdam Treaty (European Communities, 1997) states that health considerations will be considered in all EU policies and that public health should be ensured. The Amsterdam Treaty provides Member States with an opportunity to call for health impact assessments on EU policies relating to food production, distribution and control. Some such as the European Public Health Alliance (2013) and other public health lobbies (Gastein Opinion, 2002; European Public Health and Agriculture Consortium, 2011) have always thought this offered an opportunity to reform the MDP programme and to link it to health protection and the development of EU dietary guidelines and an EU nutrition

policy for the most deprived. These moves were resisted by the officials in DG Agri yet the appeal against the scheme by Germany, on these same grounds, has resulted in the MDP programme being abandoned. The key actors in promoting and protecting the scheme from its formation to its demise in 2103 were the public officials in Dg Agri.

In 2011/12 the decision was made to incorporate the MDP programme into a more comprehensive European Social Fund with no definitive focus on food, however intense lobbying from civic society resulted in the development of a new fund being established (see table 2)- FEAD Fund for the European Aid to the Most Deprived (Official Journal of the European Union, 2014). This has an allocated budget of €3.5 billion for the period 2014 to 2020. While this is welcome and corresponds to the allocation got the MDP for 2007-2013, it does not account for rising need across Europe nor allow for increases in the price of food and other basic commodities.

While it is too early to comments on the reach and success of this new programme a couple of observations can be made. The operation of the programme not being part of CAP or administered by DG Agri which had a voluntary element now applies to all states so for example the English government are pulling down £3.1/€3.94 million/year over seven years to fund school breakfast clubs. There is some criticism and concern at the UK Government's decision to draw down the smallest possible amount to bolster its welfare-to-work programmes and then only for England (All-Party Parliamentary Inquiry into Hunger in the United Kingdom, 2014). However the

overall budget for the seven years in the FEAD programme is only equivalent to the budget for the MDP programme so food related initiatives under the scheme will have to compete against other priorities such as clothes, soap and personal cleaning materials. This is at a time when the number in poverty (both relative and absolute) are rising (Eurostat, 2013). In other ways the programme has similarities to the MDP one with national governments deciding on priorities and which non-governmental partner organisations will be involved. Member states will have to contribute 15% in national co-financing, while for countries suffering most in the depression this may be waived, one of the key indicators here is those not able to afford a 'proper meal', this ranges from 3% in Spain to 29% in Hungary and 50% in Bulgaria.

5. Conclusion

There appears to be little or few links between the FEAD and the Third Action Programme for Public Health 2014 – 2020 in the Community, also the links with the European Social Fund are not clear there is some mention of FEAD providing individuals with the basics necessary to help them achieve their potential enable them to get a job or follow a training course such as those supported by the ESF. The original MDP programme was constituted as a part of CAP and not a social programme and while this led in time to its demise as member states raised objections to its operation; nonetheless it had links to food production and could be seen as part of a more integrated approach. Now the FEAD programme is devoid of links to other food production and public health policies, there is for example no mention of the nutritional quality of the food provided. The Public Health programme is set to give support to Member States in their efforts to

improve citizens' health and the sustainability of healthcare systems, while the European Social Fund is designed to provide employment and opportunities to lift people out of poverty. There appear to be few links between these three important programmes and it is thus hard not to see the FEAD as an emergency aid fund designed to help those most in need but having no real links to lifting people out of poverty in the short to medium term. As noted above there is a danger of institutionalizing aid through the non-governmental organisations who distribute it in the member states and of depoliticising hunger. The reasons for the establishment of the new FEAD programme are not dissimilar to the reasons for the establishment of the MDP in 1987 - the results of rising food insecurity among European citizens. As part of European inclusiveness an important difference between the FEAD and MDP programmes is that FEAD now applies to all states so that there is less chance of some member states pulling out or declining to take part, this was the case with the MDP programme where some countries did not partake based on the issue of subsidiarity (Hansard, 2012).

While the FEAD programme is welcome it is only guaranteed funding until 2020 and by this time it will need to demonstrate success in some key areas. The early calls by the European Federation of Food Banks (2013), the European Public Health Alliance (2010 and 2013) and the European Public Health and Agricultural Consortium (2011) for the MDP to focus on being part of the solution to eradicate food poverty not just deliver food aid would seem pertinent to the new FEAD programme. They also recommended creating synergies with

national food aid programmes and community food projects that target food poverty. developing links to high nutritional quality and cultural acceptability of foods sourced as well as making better use of funding by focussing on certain at risk groups – homeless, maternal women and infants and linking these to national policies. Addressing these issues would help ensure continuation of the programme in 2020 when funding ends.

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Table 1 List of key actors

Directorate General Agriculture- DG Agri
Directorate General Health -DG Sanco
National Governments
EU Parliament (legislative), The EU Commission (executive), Council of the EU (acts with parliament as legislative body), The European Court of Justice
European Public Health Alliance, The European Fruit and Vegetable Alliance
European Civic Society such as the Federation of Food Banks, Red Cross, Caritas, Eurodiaconia, Salvation Army, Restos du Coeur to Secours Populaire in France.
Private sector actors such as donors to food banks, appear much later in the process after 2007/8.