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WHY DOES HUNGER PERSIST IN THE GLOBAL NORTH?

A COMPARATIVE ANALYSIS OF FOOD INSECURITY IN FRANCE AND THE UNITED STATES IN THE CONTEXT OF SDG 2

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Abstract

This thesis examines the barriers the Global North face when it comes to providing total food security. More specifically, it examined France and the United States of America's progress in achieving food security and its alignment with Sustainable Development Goal 2: Zero Hunger. Despite their high levels of economic development and capacity for food production, both countries continue to experience persistent levels of hunger and food security, revealing that the issue extends beyond food availability and is closely connected to inequality, welfare governance, and access to social protection. Therefore, the thesis explores how international human rights norms relating to the right to food are operationalised within domestic policy and examines the extent to which different welfare models influence food security outcomes.

Using a qualitative comparative case study approach, the thesis draws on international legal instruments, academic literature, and national data to analyse the implementation of food security measures in both countries. Particular attention is given to the role of the United Nations Sustainable Development Goals, the Universal Declaration of Human Rights, and the International Covenant on Economic, Social and Cultural Rights, as well as the interactions between state institutions, welfare systems, and non-state actors. The theoretical framework combines Risse and Sikkink's spiral model of human rights norm socialisation with the Welfare Regime Theory and the Social Origins Theory in order to assess how international norms are internalised and translated into domestic governance practices.

The findings suggest that while both countries formally engage with international human rights and sustainable development frameworks, their approaches to food insecurity differ significantly due to variations in welfare provision, political priorities, and institutional structures. France's stronger welfare-oriented model provides broader social protections and demonstrates greater alignment with international social rights norms, while the United States relies more heavily on market-oriented mechanisms and fragmented assistance programmes. Nevertheless, both cases reveal limitations in fully realising the right to food, particularly for vulnerable populations. The thesis concludes that achieving food security in the Global North requires not only economic resources, but also rights-based governance, stronger accountability mechanisms, and the meaningful integration of international human rights obligations into domestic policymaking.

Acronyms

AFD	Agence Française de Développement
CAP	European Common Agricultural Policy
CESCR	Committee on Economic, Social, and Cultural Rights
CFS	Committee on World Food Security
CNCDH	Commission National Consultative des Droits de l'Homme- French National Consultative Commission on Human Rights
CSO	Civil Society Organisation
DOGE	US Department of Government Efficiency
EPA	US Environmental Protection Agency
EU	European Union
FAO	Food and Agriculture Organisation
FARM	Food and Agriculture Resilience Mission
FDA	US Food and Drug Administration
FFBA	Fédération Française des Banques Alimentaires
GANHRI	Global Alliance of National Human Rights Institutions
GATT	General Agreement on Tariffs and Trade
GDP	Gross Domestic Product
HLPF	High-Level Political Forum
ICESCR	International Covenant on Economic, Social, and Cultural Rights
IFAD	International Fund for Agricultural Development

INGO	International Non-Governmental Organisation
MPI	Multidimensional Poverty Index
NCSD	National Council for Sustainable Development
NHRI	National Human Rights Institution
PAT	Projets Alimentaires Territoriaux- Territorial Food Projects
OHCHR	Office of the United Nations High Commissioner for Human Rights
SDG	Sustainable Development Goal
SNAP	Supplemental Nutrition Assistance Programme
UDHR	Universal Declaration of Human Rights
UN	United Nations
UPR	Universal Periodic Review
USAID	US Agency for International Development
USDA	US Department of Agriculture
USFSA	US Food Sovereignty Alliance
WFP	World Food Programme
WHO	World Health Organisation
WIC	Special Supplemental Nutrition Program for Women, Infants, and Children
WTO	World Trade Organisation

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1. Introduction

The right to food is directly mentioned in the Universal Declaration of Human Rights, the 2030 Global Agenda, the International Covenant on Economic, Social and Cultural Rights, and countless other international and domestic policies and plans. With four years remaining for the 2030 deadline for achieving zero hunger worldwide, that goal seems farther away than ever. Countries that are underdeveloped or facing war and conflict are struggling to meet minimum nutritional needs for their inhabitants, and famines in wartorn areas are consistently on the rise. However, issues with food security also exist in developed countries. Despite having the financial capabilities, hunger is yet to be eradicated in the most developed nations in the world. This shows that the barriers to providing an adequate food supply for all go beyond the question of mere supply and are heavily related to access, socioeconomics, and national policy making. Most importantly, issues with hunger in developed countries often remain overlooked and understudied.

The most common rhetoric on world hunger is that population growth will always lead to increased levels of poverty and starvation. This is what English economist Thomas Malthus argued in his paper "An Essay on the Principle of Population" in 1798, and his convictions dominate the intellectual understanding on food and population to this day. In contrast, former FAO Chairperson Josué de Castro published his books "The Geography of Hunger" and "The Geopolitics of Hunger" in 1946 and 1977 respectively, where he argued that hunger and population growth do not have a causal relationship because hunger already existed on a massive scale before the large population booms of the early 1900s. Instead, de Castro argues that hunger is a human-made phenomenon caused by an economic model that explicitly exploits the poor and subsequently excludes them from enjoying the benefits of their contributions[1].

Global food production allows the entire human population to consume around 3,000 kilocalories every day. This is especially true in most countries in the European Union and North America, where the surplus of food leads to overeating and higher obesity waste, and, more importantly, an abundance of food waste. The reduction of food waste it presented as the most straightforward way to expand food supply sustainably without increasing food

[1] Food and Agriculture Organization of the United Nations, "The FAO Council Chairperson Who Revolutionized the Geopolitics of Hunger."

production. In the US, uneaten food consumes around a quarter of all water usage in field irrigation, as well as 4% of the country's crude oil consumption, and contributes over 30 million tons of waste to landfills every year[2]. Agricultural outputs also don't usually directly go to human consumption, as two thirds of all grain harvested in the US is used for animal feed[3]. The United Nations has called for all states, international organisations, the business sector, and other non-state actors to make the changes necessary to ensure that the production and consumption of goods and services becomes more sustainable[4].

In Czech-Canadian policy analyst Vaclav Smil's book "How to Feed the World", the notion of food in the anthropocene era is put under a microscope as he examines what is exactly needed to end hunger, and how increasing food production globally is not and should not be the method to do so. The proof of this is that among low-income groups in many countries in the Global North, there is significant undernutrition, even though the average food supply is far above any projected need. He also discusses how nearly 2.37 billion individuals did not have adequate food in 2020, while between 720 and 811 million individuals suffered from hunger. He further explains that this is not because of shortages in food supply, but rather to persistently high levels of poverty and income inequality.

1.1 The 2030 Agenda for Sustainable Development

In 2015, all UN member-states adopted the 2030 Agenda for Sustainable Development. On the 1st of January 2016, the 17 Sustainable Development Goals (SDGs) officially came into force so that all states would begin working towards solving issues relating to poverty, inequality, climate change, and hunger. These goals build on the previous Millenium Development Goals, which provided an important framework for development, but yielded unsuccessful results[5]. In addition, the 2030 Agenda builds on many former development plans, such as Agenda 21 for the improvement of human lives and the environment, and the Johannesburg Declaration on Sustainable Development (2002). The annual High-Level Political Forum on Sustainable Development is responsible for follow-up on the progress made to achieve the goals. The ownership of the SDGs, meaning the responsibility and

[2] Smil, The History and Future of Food: How to Feed the World, 1st Printing 2025.
[3] Smil, *The History and Future of Food: How to Feed the World*, 1st Printing 2025.
[4] United Nations Department of Economic and Social Affairs, "Sustainable Consumption and Production."
[5] United Nations Department of Economic and Social Affairs, "Transforming Our World: The 2030 Agenda for Sustainable Development."

control over how the achieving the goals are planned, is decidedly broad in order to ensure all nation states, UN bodies, and international organisations share the commitment that is required to achieve the goals[6].

While the 2030 Agenda is not legally binding, all UN member-states share the responsibility to cooperate and strategise on achieving each goal globally by 2030[7]. Each government is tasked with setting its own national targets, deciding by itself how the 2030 Agenda is to be incorporated in national planning processes, policies, and strategies to achieve its goals. Moreover, the document urges all member states to determine its own optimal strategy to conduct follow-up and review mechanisms, with the support of UN regional commissions. Globally, follow-up and review will be carried out in a High-Level Political Forum (HLPF) through an annual SDG progress report. The UN Secretary General will prepare the annual report in cooperation with the entire UN system[8].

The 2030 Global Agenda was created to address the ever-increasing challenges to sustainable development, including the billions of people that live in poverty without access to basic needs, and the rising inequalities within and among countries. They cover 17 integrated and indivisible goals encompassing social, economic, and environmental aspects to sustainable development while promising to keep peace and inclusion in mind[9].

Following thorough assessments, the UN concluded that the most vulnerable countries are African countries, least developed countries, landlocked developing countries, small-island developing states, and countries in situations of conflict and post-conflict. The UN has therefore committed to end poverty by 2030 and ensure that all people are to enjoy a basic standard of living, and regards ending hunger and achieving food security as a top priority[10].

The second SDG: Zero Hunger, aims to end hunger, achieve food security, improve nutrition, and promote sustainable agriculture. The goal was set to try and provide support to the more than 600 million people worldwide that are projected to face hunger by 2030. At the time of

[6] United Nations Department of Economic and Social Affairs, “THE 17 GOALS | Sustainable Development.”
[7] United Nations, “United Nations Sustainable Development Agenda.”
[8] United Nations Department of Economic and Social Affairs, “Transforming Our World: The 2030 Agenda for Sustainable Development.”
[9] United Nations Department of Economic and Social Affairs, “Transforming Our World: The 2030 Agenda for Sustainable Development.”
[10] United Nations Department of Economic and Social Affairs, “Transforming Our World: The 2030 Agenda for Sustainable Development.”

drafting the 2030 Agenda, one in three people worldwide struggled with moderate to severe food insecurity. Malnutrition persists worldwide and continues to affect children's well-being and development, with around 200 million children being affected by stunted growth (148 million), wasting (45 million), or being overweight (37 million). The problem is exacerbated by increasing food prices and lack of access to good quality nutrition. Furthermore, very little progress has been made regarding reducing anaemia, a deficiency prevalent in 30% of women aged 15-49[11].

SDG 2 is divided into 5 sub-targets. The first target aims to end hunger and ensure access to food by all people by 2030. The second target calls to end all forms of malnutrition by 2025. The third target seeks to double agricultural productivity and incomes of small-scale food producers by 2030. The fourth target aims to ensure sustainable food production systems through the implementation of resilient agricultural practices by 2030. Finally, the fifth target aims to maintain the genetic diversity of seeds, cultivated plants, farmed and domesticated animals by 2020. Furthermore, there are three other parallel targets calling for increased investment, correcting and preventing trade restrictions and distortions, and adopting measures to ensure the proper functioning of food commodity markets.[12]

Every year, the office of the Secretary General writes a progress report on the SDGs, detailing the progress made and obstacles faced. In the 2025 Sustainable Development Progress Report, it has been stated that despite notable progress on all goals, the pace at which change is occurring is insufficient to meet the commitments made by all UN member states by 2030, specifically mentioning how one in twelve people still experience hunger.

[11] Department of Economic and Social Affairs, "Goal 2."
[12] Department of Economic and Social Affairs, "Goal 2."

The progress assessment for the 17 goals has been mapped out as follows:

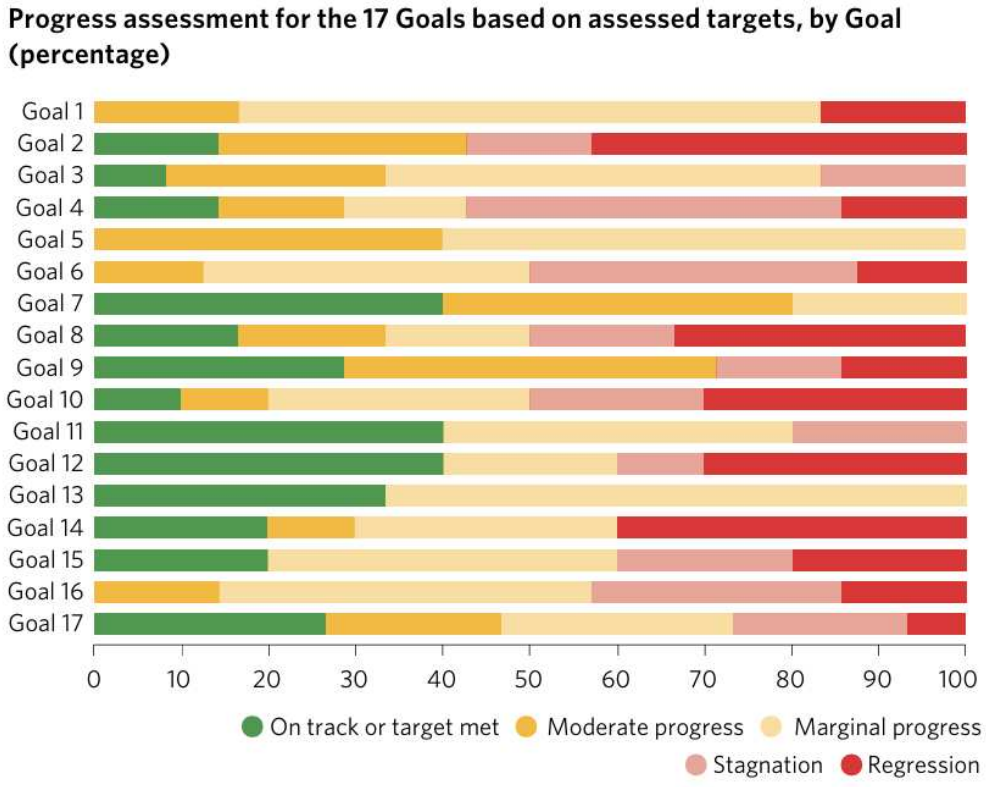


Figure 1 Progress assessment for the 17 Goals based on assessed targets, by Goal (percentage) (figure taken from United Nations *The Sustainable Development Goals Report 2025)*

When observing the above chart, it is clear that almost every goal is currently met with stagnation and regression. Furthermore, it is also clear that SDG 2: Zero Hunger is met with the highest levels of regression out of all goals, meaning that several of the metrics under SDG 2 are currently worse than they were in 2015 when the 2030 Global Agenda was drafted.

At the same time, the progress report indicated also that there was improvement in alleviating global hunger in 2024, specifically regarding certain sub targets with undernourishment falling from 8.5% to 8.3%. Progress was highly driven by improvements in South America, South and South-East Asia, while it was hindered in Northern Africa, Western Asia, and sub-Saharan Africa. Yet, the levels of undernourishment were still above the levels of 2015. Furthermore, half of the world's countries experienced moderately to abnormally high food prices in 2023, leading to rising barriers in accessing quality food.

When observing the sub-targets outlined under SDG 2, there are significant differences: the progress report stated that target 2.b (providing subsidies for agricultural exports) is on track. Meanwhile, acceleration is needed for targets 2.4 and 2.5 (sustainable agriculture and genetic resources for agriculture). Lastly, targets 2.1, 2.2, 2.a, and 2.c in related to food security, malnourishment, investment, and food prices are all in stagnation or regression[13].

Compliance with the Sustainable Development Goals (SDGs) relies on a multi-level governance architecture that connects international oversight with national implementation and accountability. They include UN bodies, National Councils for Sustainable Development, Supreme Audit Institutions, and specialised voluntary organisations. The HLPF is the central UN platform for the follow-up and review of the 2030 Agenda.

At the national level, responsibility for SDG coordination typically lies with a designated ministry or central planning authority, which oversees implementation and reporting. Supporting these efforts, National Councils for Sustainable Development (NCSDs) play a strategic role in shaping and monitoring national sustainability strategies. These councils often act as multi-stakeholder platforms, integrating perspectives from government, civil society, academia, and the private sector. Their work is further strengthened through international exchange, notably via the Global Forum for National SDG Advisory Bodies, established in 2019 to facilitate knowledge sharing and capacity building among national advisory institutions[14].

Additionally, there are several institutions specifically set up to monitor progress on reducing hunger and ensuring food security, thus actively contributing to SDG 2. Within this broader governance framework, several international organisations play a central role in monitoring and advancing progress on SDG 2. The most prominent among these are the Rome-based UN agencies: the Food and Agriculture Organisation (FAO), the International Fund for Agricultural Development (IFAD), and the World Food Programme (WFP).

[13] United Nations, The Sustainable Development Goals Report 2025.
[14] United Nations Department of Economic and Social Affairs, “The Global Forum for National SDG Advisory Bodies.”

The **Food and Agriculture Organisation** is a specialised UN agency that leads efforts to defeat hunger internationally. It is an intergovernmental organisation that was established in 1945 and is the UN's specialised agency for agriculture and food. Their primary objective is to achieve food security for all and ensure regular access to high-quality food. FAO has 194 members and operates projects in 130 countries worldwide. FAO considers itself to be at the heart of the UN development system, and aims to consistently collaborate closely with other UN agencies, funds, and programs to meet their objectives. Most importantly, FAO prioritises the integration of food security and agrifood systems transformation as integral parts of the UN's overall support to national governments[15].

Other key players in the international arena when it comes to food, the right to food, and food security include the **International Fund for Agricultural Development** and the **World Food Programme**. IFAD was established in 1977 in response to a global food crisis. It complements FAO's work as a specialised UN agency and an International Financial Institution aimed at tackling hunger and poverty in rural communities through investment and empowerment. WFP, established in 1961, provides emergency food assistance in crisis situations and supports recovery efforts in regions affected by conflict, displacement, and natural disasters. While its primary focus is humanitarian, its activities contribute to long-term food system stability and resilience.

In addition to the net of international organisations, the Commission on Human Rights established the role of **Special Rapporteur on the Right to Food** in April 2000 to improve advocacy on the right to food and was extended by the Human Rights Council in September 2007. The responsibilities of the Special Rapporteur include presenting annual reports to the Human Rights Council and the UN General Assembly regarding any implementation or research on the right to food, monitoring the situation on the right to food globally, identifying trends and performing country visits, communicating with States and other parties regarding any violations or issues, and promoting the full realisation of the right to food through communications with all relevant entities. The current Special Rapporteur is Michael Fakhri, the director of the Food Resiliency Project in the Environmental and Natural Resources Law Center[16].

[15] Permanent mission of France to the United Nations in Rome, "About FAO."
[16] United Nations Human Rights Office of the High Commissioner, "Special Rapporteur on the Right to Food."

Finally, there is a set of international treaties and covenants that shares the goal of SDG 2 to eradicate hunger in the world. The most important are the **Universal Declaration of Human Rights** (UDHR) and the **International Covenant on Economic, Social, and Cultural Rights** (ICESCR)**.**

While the UDHR introduced the concept of human rights formally to the international legal arena in 1948, the ICESCR was introduced by the UN General Assembly in 1966 as a multi-lateral treaty protecting the human rights to adequate standards of living, education, health, as well as labour rights. The ICESCR is an enormous landmark in human rights as it protects second generation rights that were not previously seen as a priority. Furthermore, unlike the Universal Declaration of Human Rights (UDHR), the ICESCR is legally binding to all states that have ratified it.

While the ICESCR, and also the UDHR, hold tremendous value as documents supporting human rights, both documents struggle to provide the right guidance on how the right to food can be enforced from a legal perspective. In order to fill this gap, the International Food Security Treaty was proposed numerous times and introduced four principles to be incorporated in domestic and international law, where each signatory commits to provide access to food, contribute to a World Food Reserve and Resource Center, establish laws prohibiting the denial of food, and aid the UN's food security enforcement actions in nations that require additional support[17]. Despite consistent endorsements, the treaty was never formalised, leaving no legally binding framework for achieving zero-hunger in international law.

1.2 National Human Rights Institutions

National Human Rights Institutions (NHRIs) are state bodies that are mandated to protect and promote human rights within a state. They are independent from the state and government and play a pivotal role in promoting and protecting the human rights of all people in a country. NHRIs are established by the State and are given a broad constitutional or legal mandate. Their role is to monitor and report on matters concerning human rights in their respective country. They also cooperate with the government regarding their international human rights obligations and provide guidance when it comes to the implementation of

[17] International Monetary Fund, "Joint Statement by the Heads of the Food and Agriculture Organization, International Monetary Fund, World Bank Group, World Food Programme, and World Trade Organization on the Global Food Security Crisis."

international human rights standards on the national level. Moreover, NHRIs are responsible for investigating human rights violations in a country and support the victims of the violation in seeking justice and remedies[18].

The Paris Principles, developed by NHRIs in 1991 and adopted by the UN General Assembly in 1993, outline internationally agreed minimum standards for NHRIs and are how they achieve credibility. According to the Paris Principles, NHRIs need to be entirely independent in law, membership, operations, policy, and control of resources. They must also have a broad mandate, broad functions, adequate powers and resources, and must have cooperative methods and engage with international bodies. NHRIs worldwide are accredited by the Global Alliance of National Human Rights Institutions (GANHRI). The status of an NHRI can either be A (full compliance) or B (partial compliance), depending on the extent to which they abide by the standards set by the Paris Principles[19].

NHRIs have numerous responsibilities regarding human rights in their own countries. Firstly, they are responsible for monitoring and reporting in order to prevent human rights abuses. Their reporting should ideally focus on groups that are most at risk of violations, this includes women, persons with disabilities, and migrants. The NHRIs' findings are published alongside recommendations to the government. Their role in monitoring and reporting is extremely beneficial in order for the state to be compliant with both national and international human rights standards, as the NHRIs hold the state accountable. Furthermore, NHRIs are expected to provide advice to governments, parliament, and other relevant stakeholders in upholding human rights standards. They often submit opinions, recommendations, proposals, and reports on the matter and should follow up with advocating for change and monitoring any implementation to ensure the government is operating in a transparent manner.

NHRIs also tackle human rights complaints. In order to do so, they need adequate agency in order to proceed with investigating, taking witness testimony, and conducting any needed inspections. In many states, NHRIs are legally required to attempt to resolve disputes that are brought forward by complaints. NHRIs should prioritise groups that are at risk of experiencing human rights violations by ensuring that the complaint mechanism is accessible

[18] Global Alliance of National Human Rights Institutions, "National Human Rights Institutions."
[19] Global Alliance of National Human Rights Institutions, "Paris Principles."

to all and providing the necessary education and awareness needed to bring forward a complaint.

Moreover, NHRIs are responsible for furthering education on human rights in a state. This is done by formulating relevant, accessible, and inclusive programmes about human rights and ensuring their execution in schools, universities, and professional circles. Education around human rights is important for preventing human rights abuse within communities, but also to improve existing perceptions around human rights. The targets that NHRIs try to reach through education are rights holders who are most vulnerable to violations, duty bearers who have the power to both defend and abuse the human rights of others, and influencers who are capable of changing others' perceptions on human rights.

Lastly, it is paramount that NHRIs cooperate internationally. All NHRIs have the ability to assist on special procedures and can work alongside special rapporteurs in their activities, especially regarding country visits. In addition, all NHRIs are encouraged to engage with treaty monitoring bodies, especially regarding country reviews, and can even obtain support from GANHRI if they need it. In fact, GANHRI supports NHRIs to engage with several UN bodies and mechanisms, including the UN bodies working on business and human rights, migration, women's rights, and the SDGs. Some participation is only granted to "A status" fully compliant NHRIs, such as the participation in all aspects of the work with the Human Rights Council, and the contribution to most stages of the Universal Periodic Review (UPR), a process that reviews the human rights records of all UN member states. GANHRI supports the "A status" NHRIs in engaging with both processes as well as coordinates among them.

1.3 The Global North

It is of course important to pay attention to the countries that are the most affected by food insecurity in order to achieve the targets laid out in the 2030 Agenda. That group of countries consists of the least developed countries and countries in situations of conflict. However, to reach "zero hunger", it is important to reach all people affected by food insecurity, including those in countries that are more economically developed. This is particularly important as the world progresses towards the target. Reaching the last few percent always presents the biggest challenge. Hence, it is worth analysing already today the barriers of closing the final

gap to reaching zero hunger. To do so, this thesis studies these barriers in the setting of more economically developed countries.

In an attempt to identify different groups of countries, there have been varying definitions. Therefore, it is important to briefly outline the notions that are adopted in referring to these different groups of countries. Throughout recent history, there has been an evolution in defining more economically advanced countries versus lesser economically advanced countries. The three-world system dividing countries according to their alignment during the cold war has been largely abandoned by political scientists, as has the system of developed versus developing countries. Currently, it is widely acceptable to use the Global North and the Global South to indicate the dichotomy between the two groups. With the Global North including Canada, the United States, Europe, and some countries in Oceania and Asia, and the Global South including Latin America, Africa, Asia (excluding South Korea, Japan, Taiwan, and Israel), and Oceania (excluding Australia and New Zealand)[20]. The existence of this dichotomy is intrinsically flawed due to the varying levels of different types of development in each state, but for the lack of better terminology, this thesis will continue to use the terms "Global North" and "Global South" to indicate historically more or less economically advanced countries.

Due to their economic advantages, countries in the Global North are generally considered as more capable in implementing policies and projects for the political, economic, and social well-being of their inhabitants. This includes also the guarantee of basic needs, such as housing or ensuring the availability of quality food to every individual living in the state. Countries in the Global North do, in fact, have smaller proportions of poverty among their inhabitants, as well as adequate minimum wages, good availability of food, and a smaller amount of food deserts (geographic areas where the access to affordable and nutritious food is restricted or nonexistent)[21].

Nonetheless, there are shortfalls in the established systems that cause barriers for certain demographics, such as the homeless population, minorities, and migrants, and refugees. Instability in food prices can aggravate the vulnerabilities that these demographics face, which can be caused by international conflicts or events that lead to economic shocks such as

[20] Kenny, "Global North and Global South | Definition, Countries, Differences, History, Map, & Facts."
[21] Food Empowerment Project, *Food Deserts*.

the COVID-19 pandemic. In 2014, 34 million people have been recorded to be chronically undernourished in the Global North, today, that number is estimated to be around 40 million, or 2% of the population of the Global North[22].

In sum, it is important to note the following on observing food security in the Global North. Firstly, there is an increasing trend of food insecurity and hunger in the Global North due to the existing polycrisis of recovering from the COVID-19 pandemic and ongoing geopolitical wars. The polycrisis has reversed a lot of the progress made to achieve SDG 2. Thus, it is important to study food insecurity in the Global North to understand how to maintain what has already been achieved regarding food security in the Global North. Secondly, the issue of hunger in the Global North remains understudied which leads to limited data availability on hunger in the countries of the Global North. Consequently, the assumption simply is that there is a "negligible" percentage of individuals suffering from hunger that are not accounted for, when, in fact, those last 2-5% are the hardest to reach, and are the most in need of support. For this purpose, this thesis will focus on how economically advantaged countries in the Global North try to achieve zero hunger, because this will allow a future roadmap for other countries on how the most difficult demographics suffering from hunger have been reached.

1.4 Case Selection and Research Plan

This thesis adopts a comparative case study design focusing on France and the United States to examine why hunger persists in economically advanced contexts despite high levels of development. The selection of these two countries is guided by considerations with regards to their economic capacity, their differing welfare state models, and their contrasting policy commitments to international agreements.

The two countries embody fundamentally different welfare state traditions. France is typically characterised as a comprehensive, state-centered welfare system with strong redistributive mechanisms, whereas the United States represents a more market-oriented and residual welfare model. This divergence provides a useful analytical contrast to assess how different institutional arrangements influence food security outcomes. By comparing these

[22] Sinha, "Right to Food."

two cases, the thesis can identify whether higher levels of social protection translate into more effective mitigation of hunger, or whether other factors intervene.

A key indicator supporting this comparison is public social spending as a share of GDP. Data from OECD and visualised by Our World in Data (see Figure 2) shows that France allocates approximately 30% of its GDP to social welfare, while the United States spends around 20%. In contrast, countries typically categorised within the Global South, such as Chile, Mexico, or Peru, spend between roughly 7% and 14%. This substantial difference underscores France's stronger institutional commitment to social protection relative to the United States, while both still exceed spending levels in countries of the Global South[23].

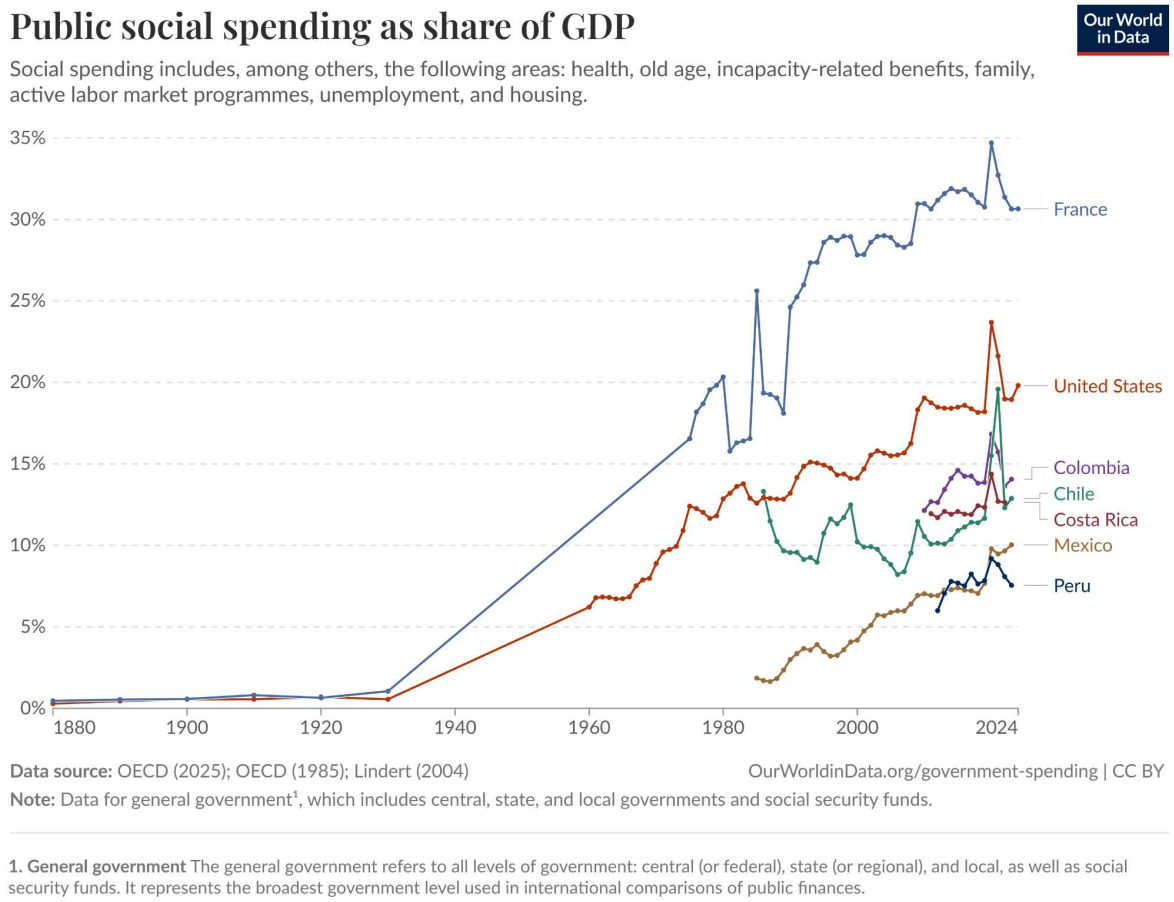


Figure 2 Public social spending as share of GDP (figure taken from Our World in Data)

At the same time, the comparison reveals a paradox: despite having the largest economy globally (currently over 32 trillion USD)[24], the United States' proportional investment in social welfare remains comparatively modest. Notably, its spending level is only slightly

[23] Our World in Data, "Public Social Spending as Share of GDP."
[24] Worldometer, "GDP by Country."

above that of some upper-middle-income countries in recent years. This raises critical questions about the relationship between economic wealth, political priorities, and social outcomes such as food security. A more detailed justification of the case selection and methodological approach will be provided in the methodology chapter.

Examining both countries will help further explain how different welfare systems aim to achieve the targets they have set out for themselves. To provide a more coherent overview on these mechanics, this thesis will be answering two interlinked research questions. The research questions the thesis will attempt to answer is:

1) *How do states in the Global North operationalise international human rights norms in the context of achieving zero hunger?*

2) *How do different welfare systems realise the strategies, challenges, and implications of achieving zero hunger in France and the US?*

The relevance of answering these research questions comes from specific gaps in the available academic literature on how affluent nations currently struggle with granting some of the most basic human rights. There is a prominent temporal aspect as well, considering that the "deadline" for achieving the sustainable development goals is in 2030, leaving approximately 3 years for all 17 goals to be achieved. Governments of the most economically advanced countries in the world would ideally be serving as a guide for other countries on how all SDGs are possible to achieve. However, such a guide is currently difficult to produce as most countries struggle to reach the finish line. The findings from the research conducted could benefit national and international policymakers as well as future drafters of the next international human rights agenda, where the importance of providing clear, measurable, and realistic targets will be paramount.

1.5 Structure

This paper will start with a review of existing literature on food, SDG 2, food security, and food as a human right, where some research gaps will be identified, as well as some arguments explaining the nature of said achieving zero hunger. Moving further, the methodological component of the paper will be addressed to outline how the research will be

proceeding, along with the introduction of the key theories on the socialisation of norms and welfare provision that will be used to support the key arguments presented in this thesis. Afterwards, a comparative case study will be conducted exploring and comparing how the governments of the United States of America and France are working to achieve zero hunger and total food security, specifically regarding their adherence to international legislation. Following the comparative case study, an analysis of their methods will be conducted through the scope of the aforementioned theories. Lastly, this paper will conclude with an overview of how the findings in this paper contribute to the knowledge on the SDGs and achieving them specifically in the Global North, as well as propose some ways the research can move forward.

2. Literature Review

This thesis aims to contribute to the academic discussion on food security and its close relation to human rights. To do so, this section first looks into how human rights, food security, and international law intertwine in the existing academic literature as well as which barriers to achieving zero-hunger worldwide are discussed by various authors.

Moreover, in reviewing the existing academic literature, this chapter provides guidance for understanding the issues with solving world hunger from an international perspective. In addition, this chapter outlines the different actions and procedures that are needed according to the academic consensus to achieve zero hunger and ensure food security globally.

The structure of this chapter is as follows: Firstly, this chapter provides a general introduction to food as a human right, going into its history and significance in modern-day international law. Secondly, this chapter reviews the current state of the right to food in international human rights legislation, and the impact this has on succeeding in ensuring food security. Finally, this chapter concludes with a discussion of the academic literature on the barriers to achieving Sustainable Development Goal 2 (Zero Hunger) by 2030 and highlights known weaknesses in domestic and international policy regarding SDG 2.

2.1 The History of Food in International Human Rights Legislation

The development of food as a human right within international law reflects a broader evolution in the understanding of human dignity, state obligations, and global responsibility. At its foundation, international human rights law is designed to ensure that the treatment of individuals is not left solely to the discretion of national governments but is instead guided by universal principles of equality and emancipation[25]. Yet, the human rights discourse has not been immune to political contestation, as neoliberal actors historically sought to appropriate human rights language to legitimise market-oriented governance, often at the expense of economic, social, and cultural rights, including the right to food[26]. This tension between universal rights and market-driven policy continues to shape the implementation of food-related rights today.

[25] Cambou and Toivanen, "Human Rights."
[26] Whyte 2019, cited in Cambou and Toivanen, "Human Rights."

The modern trajectory of the right to food is often traced back to Franklin D. Roosevelt's 1941 State of the Union address, in which he articulated the "Four Freedoms," including the "freedom from want." Many authors interpret this freedom as an early political articulation of the freedom from hunger and a precursor to later codifications of the right to food[27]. This conceptual foundation was formalised in 1948 with the adoption of the Universal Declaration of Human Rights. Article 25 of the UDHR explicitly recognises the right of every person to "a standard of living adequate for the health and well-being of himself and his family, including food…"[28] [29]. As Sinha argues, the inclusion of food in the UDHR underscores its intrinsic link to human dignity, the core value underpinning the entire declaration[30]. Moreover, by referencing food directly, the UDHR implicitly requires states to establish the social, economic, and environmental conditions necessary for its realisation. Sinha further elaborates that this goes beyond mere food availability and encompasses also social justice and appropriate policy frameworks at both national and international levels[31].

The next major milestone in the legal recognition of the right to food was the adoption of the International Covenant on Economic, Social and Cultural Rights in 1966, which entered into force in 1976. Article 11 of the ICESCR reiterates the right to an adequate standard of living, including adequate food, and obliges States Parties to take "appropriate steps" to ensure its realisation[32]. Article 11(2) goes further by recognising "the fundamental right of everyone to be free from hunger" and requiring states to take concrete measures such as improving food production, conservation, and distribution, and ensuring equitable global food supply[33]. While the covenant establishes a binding legal basis for the right to food, scholars highlight that its wording leaves significant discretion to states. Sinha notes that the ICESCR's emphasis on "taking steps" rather than guaranteeing outcomes creates flexibility that may weaken implementation[34]. Article 2(3), which allows developing countries to determine the extent to which they guarantee economic rights to non-nationals, has been criticised for enabling the exclusion of certain groups from fundamental rights protections based on economic

[27] FDR Presidential Library & Museum, "FDR and the Four Freedoms Speech."
[28] Universal Declaration of Human Rights.
[29] Sinha, "Right to Food."
[30] Sinha, "Right to Food."
[31] Sinha, "Right to Food."
[32] OHCHR, "International Covenant on Economic, Social and Cultural Rights."
[33] OHCHR, "International Covenant on Economic, Social and Cultural Rights."
[34] Sinha, "Right to Food."

capacity[35]. Notably, no comparable exceptions exist for developed countries, a gap that receives limited attention in the literature.

Despite these limitations, the ICESCR establishes important principles. It affirms that states must not remain passive: the obligation to "take steps" is both immediate and continuous, prohibiting inaction or regression. The covenant also emphasises international cooperation, recognising that many states depend on others for technical and economic support in fulfilling economic, social, and cultural rights. Furthermore, the ICESCR underscores the need for effective remedies and legislative measures, whose public nature allows for scrutiny and accountability. The covenant also acknowledges that certain groups—such as children, young people, and mothers—require special protection, particularly in relation to nutrition and health[36].

To oversee implementation, the UN established the Committee on Economic, Social and Cultural Rights (CESCR) in 1985. The CESCR engages in dialogue with states, evaluates compliance, and issues recommendations to strengthen the realisation of covenant rights[37]. In its interpretive work, the Committee has clarified that the core content of the right to food requires the "availability of food in quantity and quality sufficient to satisfy the dietary needs of individuals free from adverse substances"[38]. General Comment No. 12 further stresses that urgent measures may be required to ensure freedom from hunger, distinguishing hunger and malnutrition as acute violations demanding immediate action[39].

The 1996 World Food Summit in Rome marked another significant development by formally linking the right to food with the concept of food security. This shift reflected advances in understanding food not merely as a commodity or a minimum subsistence requirement, but as a multidimensional human right. The Summit's widely adopted definition states that food security exists "when all people, at all times, have physical, social and economic access to sufficient safe and nutritious food that meets their dietary needs and food preferences for an active and healthy life." This definition identifies four dimensions of food security, namely availability, access, utilisation, and stability, each of which provides substantive content to the

[35] Sinha, "Right to Food."
[36] Sinha, "Right to Food."
[37] European Country of Origin Information Network, "CESCR – UN Committee on Economic, Social and Cultural Rights – Source Description – Ecoi.Net."
[38] Sinha, "Right to Food."
[39] Kent, "The Human Right to Food and Dignity."

right to food and provides a clear interpretation of what should be understood by the term "adequacy" of food in legal documents[40]. These advances also informed the Summit's Plan of Action, which called on the UN High Commissioner for Human Rights to clarify the rights related to food under Article 11 of the ICESCR and propose strategies for their implementation[41].

Despite the growing body of international law and the near-universal recognition of the right to food, its implementation remains uneven. As Sinha argues, there is a substantial gap between formal recognition and effective realisation[42]. This gap is particularly visible in countries that resist framing food access as a human right. For example, the United States remains one of the few governments that explicitly opposes recognising a human right to adequate food, largely due to its longstanding rejection of economic rights as enforceable obligations[43]. While the US operates extensive food assistance programs, such as the Supplemental Nutrition Assistance Programme (SNAP), school lunches, and nutritional support for women and children, these are not grounded in international human rights law[44]. The persistence of hunger in countries with advanced economies underscores the ongoing challenges in translating legal recognition into meaningful protection, and highlights the need for stronger accountability mechanisms, clearer state obligations, and more robust international cooperation.

2.2 The Current State of the Right to Food in International Law

The state of the right to food in international law reflects both significant normative progress and persistent gaps between legal recognition and practical realisation. While the right to food is firmly embedded in the framework of economic, social, and cultural rights, its implementation remains uneven across regions, shaped by differing political priorities, institutional capacities, and interpretations of state obligations. As Sinha argues, the ICESCR establishes that states must take legislative, judicial, administrative, financial, educational, and social measures to progressively realise the right to food, and it identifies a minimum core obligation that includes the provision of essential food, primary health care, basic

[40] Sinha, "Right to Food."
[41] Kent, "The Human Right to Food and Dignity."
[42] Sinha, "Right to Food."
[43] Kent, "The Human Right to Food and Dignity."
[44] Kent, "The Human Right to Food and Dignity."

shelter, housing, and education[45]. This minimum obligation is intended to ensure that no individual is deprived of the basic conditions necessary for survival and dignity, yet the extent to which states meet these obligations varies widely.

A central challenge in assessing the current state of the right to food lies in the ambiguity between rights grounded in international law and those derived from domestic social policy. Kent notes that the distinction between universal rights and locally created entitlements is often blurred, since social service programs are frequently described as implementing international human rights even when they originate entirely at the national level[46]. This ambiguity is compounded by the lack of high-quality reporting on the implementation of the right to food in many countries, which limits the ability of international bodies to monitor compliance and hold states accountable[47]. The result is a fragmented global landscape in which formal commitments to the right to food coexist with inconsistent or incomplete domestic enforcement.

At the same time, the literature notes that the evolution of related concepts such as resilience and food sovereignty has broadened the understanding of what the right to food entails in practice. Walsh-Dilley, Wolford, and McCarthy describe resilience as a response to increasing social and ecological volatility, particularly in the context of climate change, and argue that adaptive capacity depends on access to natural, social, political, and economic resources[48]. From this perspective, ensuring the right to food requires more than guaranteeing caloric intake, it requires strengthening the ability of communities to withstand shocks and maintain control over their food systems. Food sovereignty, which emphasises the right of people to define their own agricultural and food policies in culturally and ecologically appropriate ways, has emerged as a complementary framework that highlights the interdependence of social and ecological systems and the importance of local governance, knowledge, and autonomy. Agrarian movements use rights-based claims not only to demand access to food, but also to assert rights to the resources necessary for food production, including land, water, and political participation[49]. These developments underscore that inequality is not merely a consequence of failed resilience, but a barrier to building resilience in the first place.

[45] Sinha, "Right to Food."
[46] Kent, "The Human Right to Food and Dignity."
[47] Sinha, "Right to Food."
[48] Walsh-Dilley et al., "Rights for Resilience."
[49] Walsh-Dilley et al., "Rights for Resilience."

The academic literature also emphasises that the right to food cannot be isolated from broader questions of human insecurity, poverty, and social exclusion. Gaiha argues that food insecurity must be always be understood through the lens of persistent poverty, capability failures, and repression, all of which are worsened by natural disasters and conflict[50]. In his capability approach, Amartya Sen highlights that poverty constitutes a denial of rights, and that the right to food is fundamentally an entitlement to the resources and opportunities necessary to secure adequate nutrition. This perspective reinforces the interdependence of economic, social, civil, and political rights, challenging the notion that only civil and political rights are justiciable. Gaiha further contends that economic and social rights are not inherently more costly to safeguard, and that framing the right to food as a right to policy, rather than a vague moral obligation, would strengthen its enforceability by clarifying entitlements, obligations, and mechanisms of accountability[51].

Regional experiences illustrate both the potential and the limitations of current international frameworks. Much of the literature focuses on the Global South, particularly India, where the judiciary has played a significant role in expanding the enforceability of economic and social rights. Although the Indian Constitution does not explicitly recognise a fundamental right to food, the Supreme Court has interpreted the right to life under Article 21 to include rights such as health, thereby making aspects of the ICESCR directly enforceable, potentially extending as far as the right to food[52]. Through creative interpretation, the judiciary has overcome constitutional barriers to justiciability, enabling courts to enforce certain socio-economic rights despite the non-binding nature of directive principles of state policy. Yet, India also illustrates the paradox of food insecurity in contexts of abundance, as malnutrition and starvation persist despite domestic food surpluses. Sen's observation that hunger is primarily a problem of poverty rather than food availability remains highly relevant, and Drèze's characterisation of food insecurity as a "silent emergency" highlights the political dimensions of the issue, including the lack of political will and the barriers to democratic participation created by economic insecurity, poor education, and social

[50] Gaiha, "Does the Right to Food Matter?"
[51] Gaiha, "Does the Right to Food Matter?"
[52] Sinha, "Right to Food."

discrimination[53]. Collaboration with NHRIs is therefore essential to strengthen accountability and ensure that legal recognition translates into meaningful protection[54].

In contrast to the extensive literature on the Global South, scholarship on the right to food in the Global North is more limited, yet emerging debates around food sovereignty, food justice, and local food systems start to point to important tensions. For instance, Pimbert notes that short food chains in Europe generate social and economic benefits by strengthening community ties and retaining value within local economies, yet these systems are threatened by the global restructuring of agri-food markets and by development agendas that prioritise industrialisation over rural livelihoods[55]. Food sovereignty movements in Europe advocate for the right of communities to define their own food systems, regulate agricultural production, and pursue ecological sustainability, as illustrated by initiatives such as Terre de Liens in France, which acquires farmland to preserve it for organic agriculture and local food networks[56]. These movements call for a re-politicisation of food, urging communities to articulate what the right to food should mean in their specific social and ecological contexts.

At the policy level, the European Union presents a mixed picture. Zahrnt argues that EU food production far exceeds dietary requirements and that global food supplies are sufficient to nourish the world population, meaning that food insecurity results primarily from distributional inequalities rather than scarcity[57]. Nonetheless, food security concerns are often invoked to justify agricultural tariffs and a strong Common Agricultural Policy, even though many CAP instruments undermine long-term ecological sustainability. While short-term food security in the EU is not at risk, the long-term challenges posed by climate change and environmental degradation require a reorientation of agricultural policy toward sustainability rather than intensification[58].

In addition, some literature addresses the discussion in the United States, where food insecurity persists despite extensive social safety nets, and patterns of hunger mirror global inequalities. Holt-Giménez and Wang highlight that low-income and minority communities often have limited access to healthy food, relying instead on inexpensive, calorie-dense

[53] Drèze, "Democracy and Right to Food."
[54] Sinha, "Right to Food."
[55] Pimbert, "Food Sovereignty and Autonomous Local Systems."
[56] Pimbert, "Food Sovereignty and Autonomous Local Systems."
[57] Zahrnt, Food Security and the EU's Common Agricultural Policy: Facts against Fears.
[58] Zahrnt, Food Security and the EU's Common Agricultural Policy: Facts against Fears.

options available in gas stations, corner stores, and fast-food outlets[59]. The US food movement is fragmented along lines of race and class, with food justice advocates emphasising the role of institutional racism and racialised geographies in shaping food access. Food sovereignty has also gained traction in the US, drawing on global South movements to demand democratisation of the food system and redistribution of food-producing resources[60]. These debates unfold against the backdrop of a corporate food regime in which agri-food monopolies captured significant profits during recent food crises, underscoring the structural inequalities embedded in the system. Moderate reforms such as expanding food stamps or relocating grocery stores may alleviate immediate hardship, but they do not address the root causes of food insecurity, and may even reinforce existing power imbalances. Sustainable change, according to Holt-Giménez and Wang, requires a fundamental transformation of the food regime itself[61].

Finally, research on food policy in the United States highlights the complex interplay between economic access, geographic access, and behavioral factors. Dimitri and Rogus show that the price differential between healthy and unhealthy foods contributes to the link between food insecurity and obesity, particularly among women, and that low-income communities with limited access to supermarkets face higher rates of diet-related disease[62]. Programs such as SNAP and WIC provide monetary transfers to improve nutritional intake, and initiatives like the Healthy Food Financing Initiative aim to increase geographic access to healthy food. However, the authors argue that these measures are insufficient on their own, since food choices are shaped by habitual and environmental factors that require targeted behavioral interventions. Effective food policy must therefore integrate economic, geographic, and behavioral strategies to fully address food insecurity[63]. Taken together, the literature reveals that while the right to food is well established in international law, its realisation depends on a complex interplay of legal frameworks, political will, social movements, and structural conditions. The interdependence of states in achieving zero hunger, the need for clear obligations and enforcement mechanisms, and the importance of addressing inequality and resilience all shape the contemporary landscape of the right to food. The contrast between the Global South and the Global North further illustrates that food insecurity is not merely a

[59] Holt-Giméénez and Wang, “Reform or Transformation?”
[60] Holt-Giméénez and Wang, “Reform or Transformation?”
[61] Holt-Giméénez and Wang, “Reform or Transformation?”
[62] Dimitri and Rogus, “Food Choices, Food Security, and Food Policy.”
[63] Dimitri and Rogus, “Food Choices, Food Security, and Food Policy.”

problem of scarcity, but one of access, distribution, and power, requiring both legal and systemic transformation to ensure that the right to food is meaningfully fulfilled.

2.3 Barriers to achieving Sustainable Development Goal 2: Zero Hunger

Despite the renewed global commitment embodied in the Sustainable Development Goals, the world remains far from achieving Zero Hunger by 2030. The literature consistently highlights that the persistence of hunger is rooted not in global food scarcity but in structural, political, and environmental barriers that undermine access to food and weaken the international community's capacity to respond effectively. While the SDGs were developed through an inclusive, consensus-seeking process that sought to integrate the rule of law into development policy, their implementation has been constrained by conceptual dilution and insufficient attention to the systemic drivers of food insecurity. Lwabukuna notes that the Rio+20 Outcome Document introduced the rule of law into SDG discourse, emphasising accountability, legal identity, access to justice, gender justice, and the governance of land and natural resources, yet the final SDG framework reduced this broad agenda to a narrow focus on access to justice, limiting its transformative potential[64]. This narrowing reflects a broader challenge within the SDGs, namely their difficulty in addressing the political and structural conditions that shape hunger.

The persistence and recent resurgence of global hunger underscore the gap between normative aspirations and practical implementation. Chakrabarty observes that although the Millennium Development Goal of halving global hunger had been met by 2015, the number of undernourished people began rising again within three years, driven primarily by conflict and climate-induced droughts in vulnerable regions[65]. These trends align with long-standing analyses of famine, which emphasise that famines occur not because of insufficient food production but because certain populations are unable to access available food. Sen's entitlement approach remains central to this understanding, highlighting the role of democratic institutions and a free press in preventing famine by compelling governments to protect people's entitlements[66]. Other scholars, such as De Waal, argue that famines are often the result of deliberate political actions and can function as weapons of war, reinforcing the

[64] Lwabukuna, "International Rule of Law and Development."
[65] Chakrabarty, "A Giant Leap Backwards."
[66] Chakrabarty, "A Giant Leap Backwards."

need to address conflict as a root cause of hunger[67]. The United Nations' 2018 SDG Report similarly identifies conflict and climate change as the primary drivers of rising undernourishment, underscoring that Zero Hunger cannot be achieved without progress on SDG 13 (Climate Action) and SDG 16 (Peace, Justice and Strong Institutions)[68].

The geopolitical dimensions of food security further complicate efforts to achieve SDG 2. Zhou et al. argue that food security cannot be understood solely through developmental or humanitarian lenses, as it is deeply intertwined with natural resource competition, international trade, armed conflict, and climate change[69]. Geopolitical rivalry shapes access to agricultural resources, influences trade policies, and contributes to supply disruptions that may be politically motivated. Approximately one quarter of the food produced for human consumption is traded internationally, making global food systems highly interdependent and vulnerable to unilateral actions by states seeking to secure domestic stability[70]. Armed conflict remains one of the primary drivers of food insecurity and has been responsible for much of the increase in global hunger since 2014, while climate change interacts with resource insecurity, trade volatility, and conflict to reshape both physical landscapes and political decision-making. These overlapping challenges highlight the need for integrated policy approaches and robust multilateral institutions capable of addressing the complex interplay between geopolitics and food security[71].

Beyond states, the governance landscape for food security increasingly includes transnational corporations, civil society organisations, philanthropic foundations, and financial actors, all of whom shape policy and resource allocation[72]. This diversification of governance actors creates both risks and opportunities. On one hand, unilateral measures by individual countries to secure national food supplies can undermine global efforts to achieve Zero Hunger, particularly when they exacerbate resource competition or distort markets. On the other hand, inclusive governance arrangements may support more equitable and sustainable food systems, provided that they are coordinated and grounded in international norms.

[67] Chakrabarty, "A Giant Leap Backwards."
[68] Chakrabarty, "A Giant Leap Backwards."
[69] Zhou et al., *The Geopolitics of Food Security*.
[70] Zhou et al., *The Geopolitics of Food Security*.
[71] Zhou et al., *The Geopolitics of Food Security*.
[72] Zhou et al., *The Geopolitics of Food Security*.

The SDGs themselves face internal weaknesses that hinder progress toward Zero Hunger. Gil et al. highlight that SDG 2's targets and indicators do not always align conceptually or focus on the same populations, and that vague terminology, such as "sustainable" or "fair", creates difficulties in measurement and enforcement[73]. Indicators related to agricultural productivity, sustainable food production systems, and genetic diversity are often insufficiently defined and may not be universally relevant, leading to inconsistent interpretations across countries. These weaknesses undermine the SDGs' ability to guide coherent policy action and to monitor progress effectively. At the same time, the four pillars of food security: availability, access, utilisation, and stability, require systemic thinking that integrates different factors such as food production, environmental sustainability, income generation, gender dynamics, and consumer behavior[74]. Without such integration, efforts to eradicate hunger risk addressing symptoms rather than underlying causes.

The broader context of sustainable development also shapes the prospects for achieving Zero Hunger. Lempert and Nguyen argue that the SDGs fall short of earlier international commitments to sustainability, particularly in their failure to address human-induced threats such as climate change, pollution, and geopolitical conflict[75]. Sustainable development requires balancing consumption with resource availability, yet global development models continue to prioritise growth, industrialisation, and globalisation, often at the expense of ecological sustainability and cultural security. Poverty alleviation is frequently implemented instead of aiming for genuine development, creating dependency rather than resilience, while disaster risk management systems remain inadequate for addressing global hazards that transcend traditional boundaries[76]. The authors emphasise that sustainable development planning must address root causes of vulnerability, monitor conflicts of interest, and reduce hegemonic pressures that undermine local autonomy. The SDGs, however, avoid recognising many of these threats and fail to allocate responsibility for addressing them, limiting their effectiveness as a framework for sustainable development.

Finally, the implementation of SDG 2 depends on the engagement of a wide range of actors beyond national governments. Michel notes that the United Nations has encouraged the expansion of South-South and triangular cooperation, reflecting a shift away from traditional

[73] Gil et al., "Sustainable Development Goal 2."
[74] Gil et al., "Sustainable Development Goal 2."
[75] Lempert and Nguyen, "Accounting for Threats to Sustainable Development."
[76] Lempert and Nguyen, "Accounting for Threats to Sustainable Development."

donor-recipient relationships toward more inclusive development partnerships[77]. Private philanthropy, civil society organisations, and foundations play increasingly prominent roles in shaping development policy, while the private sector is expected to drive inclusive and sustainable growth through job creation, social investment, and sustainable production and consumption patterns[78]. The European Union, for example, has explicitly sought to strengthen the role of the private sector in implementing the SDGs and contributing to food security. While this diversification of actors offers new opportunities for innovation and resource mobilisation, it also raises questions about accountability, coordination, and the alignment of private interests with public goals[79].

Taken together, the literature reveals that achieving Zero Hunger requires more than increasing food production or expanding social safety nets. It demands addressing the structural drivers of hunger, including conflict, climate change, geopolitical rivalry, weak governance, and unsustainable development models. It also requires strengthening international cooperation, clarifying SDG indicators, and ensuring that diverse governance actors operate within a coherent and accountable framework. Without confronting these systemic barriers, the global community risks falling further behind on SDG 2, with profound implications for human rights, social stability, and sustainable development.

2.4 Relevance and Contribution of the Study

After conducting this literature review, it is possible to see that the global debate on the right to food and food security has evolved into a complex, multidimensional field that spans human rights law, development studies, geopolitics, and sustainability. The reviewed literature demonstrates that hunger is rarely a consequence of insufficient global food production, but rather of structural barriers that limit access to food, including conflict, climate change, inequality, and governance failures. It also shows that the realisation of the right to food depends on a combination of legal obligations, political will, and the capacity of states and international institutions to address these systemic challenges.

[77] Michel, *The Implementing Environment for the 2030 Agenda*.
[78] Michel, *The Implementing Environment for the 2030 Agenda*.
[79] Michel, *The Implementing Environment for the 2030 Agenda*.

However, it is also possible to identify certain research gaps within the academic discussion. While there is extensive literature on the mechanisms behind achieving food security in poorer countries, particularly in the Global South, information about how this is done in the Global North is under-researched. Much of the existing literature on the Global South focuses on famine prevention, entitlement failures, resilience, food sovereignty, and the role of democratic institutions in safeguarding access to food. By contrast, the literature on the Global North tends to concentrate on different themes, such as sustainability transitions, agricultural policy reform, food justice, and the environmental impacts of industrial food systems. As a result, the specific barriers to achieving food security in economically well-off countries remain less systematically examined, despite the fact that food insecurity persists in these contexts as well.

This imbalance is likely due to the assumption that the countries in the Global North have already achieved a high level of food security and can, therefore, focus on goals that are more "advanced", such as gender equality, climate action, or sustainable consumption. Yet, as the literature on food justice and food deserts in the United States shows, food insecurity remains a significant issue even in wealthy nations, often shaped by structural inequalities, racialised geographies, and market-driven food systems. Similarly, European debates around food sovereignty, agricultural sustainability, and the Common Agricultural Policy reveal that food security challenges in the Global North are not only present but deeply intertwined with political and economic structures, despite indeed having issues with food security.

As it is key to also understand how economically well-off countries can achieve food security and zero hunger, it is worth studying how countries in the Global North such as France and the United States of America deal with these challenges and how they adhere to international policies such as the 2030 Global Agenda, versus their reliance on their own internal frameworks to achieve human rights goals. Therefore, this work will attempt to fill these gaps in the literature by conducting a case study on how France and the United States operate to achieve food security and zero hunger. Moreover, it will explore the governance bodies monitoring compliance with the Sustainable Development Goals and whether they are finding positive measurable outcomes. It will examine the legal, institutional, and policy frameworks through which these countries address food insecurity, as well as the extent to which they align with or diverge from international human rights standards. In doing so, this work hopes to contribute to the literature, particularly in terms of highlighting the distinct

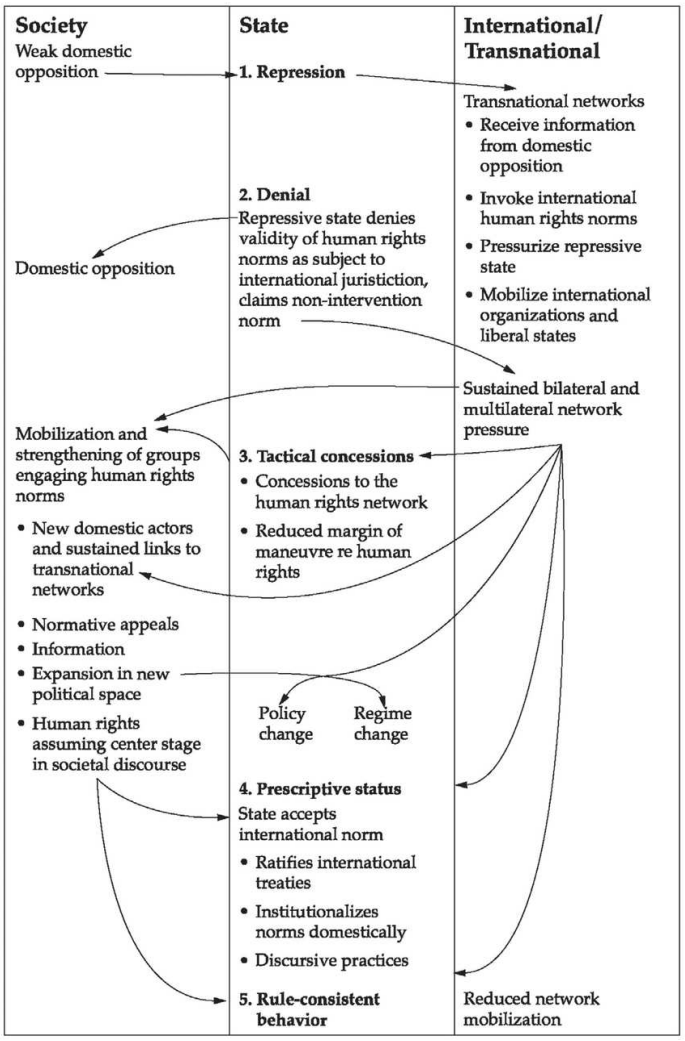
challenges and opportunities that arise in high-income contexts. Moreover, by situating the experiences of France and the United States within the broader academic debate, this study aims to contribute to a more balanced understanding of global food security, one that recognises the importance of examining both the Global South and the Global North.

3. Conceptual and Theoretical Framework

This chapter outlines the conceptual and theoretical framework applied in this thesis. It will first introduce the different theories it employs, followed by a description of how it operationalises it.

3.1 Risse and Sikkink's Spiral Model

Thomas Risse and Kathryn Sikkink's spiral model was created in the late 1990s to better explain how repressive countries gradually become more and more in line with the rhetoric of human rights as outlined in the international arena[80]. They proposed five phases that repressive regimes go through to do so, which are: 1) repression, 2) denial, 3) tactical concessions, 4) prescriptive status, and lastly, 5) rule-consistent behaviour.



[80] Risse and Sikkink, *The Power of Human Rights*.

Figure 3: The Risse and Sikkink Spiral Model

The first phase, repression, entails strong suppression of human rights norms and complete alienation of international human rights systems. The second phase, denial, involves the state addressing and denying the validity of human rights norms. Going from the repressive phase to denial entails that the validity of the human rights norms are not yet accepted, and that international involvement in domestic policy is unwelcome. Denial, while negative, is still an interaction with the international human rights system and signifies a start towards positive change. The third phase, tactical concessions, is the beginning of the state's use of compromise on human rights issues for purposes tied to maintaining their legitimacy. Tactical concessions occur in order to appease the international order as well as domestic advocacy efforts in order to obtain favour or funding, they facilitate social mobilisation and the validation given to the human rights norms will eventually trigger the next phase. "Prescriptive status" means that the state has started accepting international human rights norms through ratification and institutionalisation and is now habitually referring to the human rights norms to describe their own behaviour. Finally, rule-consistent behaviour is considered the final phase and represents the complete transformation of the state to one that fully recognises human rights and might also internationally engage in its promotion and preservation.

In addition to the aforementioned five phases, Risse and Sikkink highlight the importance of advocacy networks in advancing progress, as they focus on violating states by pushing for moral consciousness-raising worldwide, they empower opposition groups, social movements, and NGOs that advocate for human rights, and lastly, they challenge violating states by creating structures to pressure them from above and below. The framework of the spiral model includes four levels that interact with one another:

1. International/transnational interactions of international non-governmental organisations (INGOs), international human rights organisations, and Western states.
2. Domestic Society
3. Links between societal opposition and transnational networks
4. National Government

Risse and Sikkink developed this model to better understand which international human rights norms are internalised by nation states and implemented on domestic level. They have deduced that improving the condition of human rights requires a degree of political transformation, and thus changes in human rights requires structural changes in domestic policy. The tensions of these changes occur due to the ever-existing struggles between national sovereignty and the internationalisation of human rights norms through binding and non-binding international conventions. As for why this internalisation occurs, Risse and Sikkink base their paper on social constructivism, where communicative processes are the most powerful tool at inciting change, it considers the interests of actors as part of their identity, and are redefined through exposure.

The process in which nations become more eager to adopt human rights policy almost always starts with pressure, and then, with time, it can lead to genuine structural change and identity transformation. They mention former US President Ronald Raegan's administration as an example, as his position on democracy gradually moved from being a tool for an aggressive foreign policy against the USSR and the second world, to genuine belief in the importance of democratisation and began advocating for it in countries such as Chile and Uruguay. Thus the importance of socialisation for the genuine internalisation of norms without the need for external pressure is demonstrated, and emphasises that a state's political identity is produced not in a vacuum, but through socialisation with other states, international organisations, non-governmental organisations, and advocacy bodies. In their book, Risse and Sikkink distinguish three types of socialisation: adaptation and strategic bargaining, moral consciousness-raising, and institutionalisation and habitualisation. Adaptation and strategic bargaining typically involves the pressure from, within, and outside the nation state leading to some concessions and "granting" of some human rights in order to regain favour, but without necessarily believing in the validity of the human rights themselves. Moral consciousness-raising involves communication and persuasion, where actors end up accepting the validity of the norms they once contested through moral discourse with other actors. Institutionalisation involves the genuine incorporation of the norms into policy in an effective manner. Lastly, Risse and Sikkink conclude by stating that while international factors are what largely influenced the creation of the spiral model, it is not the only factor responsible for democratisation and is not alone sufficient to take credit for states regarding human rights more favourably.

While this theory holds great merit on how countries gradually become more and more inclined to internalise human rights rhetoric and policy, using this as a base for analysis can have some disadvantages. Firstly, economically developed countries have been largely excluded in both the empirical research done to formulate this theory, and the conclusions it serves. "Western States" are depicted as entities that, in cooperation with international organisations and advocacy bodies, further human rights in the rest of the world. Furthermore, it is also important to consider that Risse and Sikkink wrote their book in 1999, when there was primacy of human rights in the international arena, as exhibited by tribunals for war crimes in Rwanda and Yugoslavia, as well as strong human-rights centered sentiments expressed in regards to the Iraqi invasion of Kuwait and the First Gulf War[81]. Nowadays, the status of "Western States" as pure promoters of human rights, and as examples of correct behaviour for the rest of the world is called into question more often, and human rights are seen as ever-evolving, and requiring constant discussion and improvement, thus entailing that they can never be fully "achieved".

3.2 Theories of Welfare States

The **Welfare Regime Theory** acknowledges that welfare is seen variably depending on the state. It can be defined broadly and relating to political economy, employment, wages, and macroeconomics, or narrowly through social amelioration, income transfer, and the provision of social services. Danish sociologist Gosta Esping-Andersin wrote his book titled "The Three Worlds of Welfare Capitalism" in 1990[82], where he distinguished three different types of Western welfare states. The three types are liberal regimes, conservative regimes, and social democratic regimes. Liberal regimes encourage market solutions to social problems, mainly targeting low-income individuals and work to guarantee a minimum standard of living. Conservative regimes focus on traditional family-based solutions to poverty, state assistance in this type of regime is limited to when the family's capacity to support its members is no longer sufficient. Lastly, social democratic regimes promote a high standard of equity and aim to provide welfare for all, this leads to a strong commitment to providing social services and minimising social issues.

[81] Aber, "Worldmaking at the End of History."
[82] Esping-Andersen, *The Three Worlds of Welfare Capitalism*.three

Esping Andersin also explained that he sees that the theoretical models of the welfare model are inadequate and highlights that that in any welfare model, there is a cooperation between the private and the public sector as neither markets nor the state are naturally equipped to develop welfare so the existence of the private sector could be seen as an aid. This theory also connects welfare provision to democratisation which is aiming to leave behind the laissez-faire approaches that were regularly used in weaker welfare regimes, as more institutions will focus on the "median voter" and begin to focus on their needs. This theory distinguishes two types of welfare regimes: residual welfare states aim to provide aid only when the family or market fails, institutional welfare states aim to help the entire population.

In contrast, the **Social Origins Theory** argues against the welfare regime theory by stating that it is far too limited, one-dimensional, and therefore does not take neither the non-profit sector's, nor the families' role in current policy development under consideration. This kind of oversight could lead to the false conclusion that economic development is directly correlated with adequate provision of welfare and that the non-profit sector and the state are in a natural state of competition, when the reality is much more complicated. In fact, the state often relies on the non-profit sector for their expertise and ability to reach the field quicker than the state possibly can, that is in addition to the fact that the non-profit sector is capable of mobilising political support to make way for governmental involvement in certain areas. Also, the non-profit sector is in need of the state to reach areas they cannot due to their existing limitations regarding jurisdiction and accessibility.[83]

In reality, the different ways states carry out their welfare services can be divided into four, which could therefore divide government behaviour and interactions into four different ways: liberal, corporatist, social democratic, and statist. The liberal welfare regime involves very limited social assistance with rules to determine who is entitled to it, which indicates minimal economic interventionism in a state, this is coupled with a high amount of work done by non-profit organisations. Meanwhile, the corporatist welfare regime involves the state providing welfare services while still having a large non-profit sector to fill in some gaps left by the state's structure. The social democratic model entails the separation of welfare provision from the market due to the existence of extensive welfare services that cover many different areas which leads to low non-profit activity regarding the provision of services, but

[83] Salamon and Anheier, "Social Origins of Civil Society."

are still active in other areas such as advocacy. Lastly, states that follow the statist model have low amounts of governmentally provided welfare services as well as low non-profit activity as they are both constrained to give selected elites the upper hand. Therefore, the theory calls for a more cohesive approach. The social origin model carefully addresses different social aspects that could impact non-profit sector activity, such as financial cooperation and sources of financing for the non-profit sector. If the financial cooperation is low, like in liberal and social democratic welfare systems, then the role of a private funder is also brought into this network, while in a corporatist regime the financial cooperation exists between the non-profit sector and the state.

3.3 Operationalisation of the Theories

The abovementioned theories will be employed to analyse how the United States of America and France approach improving food access for all and align to the 2030 World Agenda. The first presented theoretical model, Risse and Sikkink's spiral model, will be used as the primary theoretical basis to further analyse where the selected states stand when it specifically comes to the right to food. In the previous chapter, I outlined some of the shortfalls that the spiral model presents, specifically regarding its focus on the Global South as the repressive states, and the Global North as agents to support the Global South and promote the spread of human rights norms. This notion does not consider the nuances and variations among the Global North when it comes to alignment with human rights, and does not contemplate the idea that, when it comes to certain rights, countries in the Global North can be in various phases on the spiral model. For the purposes of this thesis, the spiral model theory will be applied as presented by Risse and Sikkink to the United States and France with regards to their acceptance of food as a human right, and their overall alignment with international human rights conventions and rhetoric. The model will seek to explain what forces push the United States and France towards achieving total food security and zero hunger, and determine in that regard what phase of the spiral model they are in.

As for the theories on welfare states, they will be used as a supplement to further explain how affluent states go about allocating their resources and providing different forms of welfare to their inhabitants. This involves identifying the type of welfare state both the US and France seem to be under both the welfare regime theory and the social origin theory. This identification will further aid in analysing the stances and behaviours of both states when it

comes to alleviating poverty and hunger, as well as their attitude towards multilateralism and the globalisation of human rights issues.

4. Methodology and Research Design

This chapter outlines the methodological framework and research design employed in this thesis. It first introduces the overall research design and justifies the use of a qualitative comparative case study approach focusing on France and the United States. It then discusses the methods of data collection and analysis, the operationalisation of key concepts, and the broader analytical positioning of the research. Finally, the chapter reflects on the limitations of the study as well as interpretive considerations relating to qualitative policy analysis.

4.1 Research Design and Approach

This thesis adopts a qualitative comparative research design in order to answer the following research questions:

1. How do states in the Global North operationalise international human rights norms in the context of achieving zero hunger?

2. How do different welfare systems realise the strategies, challenges, and implications of achieving zero hunger in France and the US?

The study is positioned within the tradition of qualitative comparative political research and document-based policy analysis. Rather than seeking statistical generalisation across a large number of cases, the thesis aims to provide an in-depth understanding of how two economically advanced democratic nations institutionalise food-related human rights norms within different welfare and governance systems. The focus is therefore interpretive and explanatory, seeking to understand the mechanisms, institutional arrangements, and political logics that shape national approaches to food insecurity.

In order to answer the research questions, this thesis will be employing a small-N research design, conducting a comparative case study involving the United States of America and France. In doing so, the research design answers the research question qualitatively, while complementing the analysis with selective quantitative indicators, such as rates of food insecurity, public welfare spending, or poverty levels. By combining these different approaches, this thesis aims to contribute to the understanding of the political and

institutional dynamics behind policy choices and differing outcomes relating to the abovementioned research questions. Furthermore, by focusing on two highly economically developed countries in the Global North, the case selection aims to address the existing gaps in the academic discussion, while also examining the notion that hunger in the Global North represents a phenomenon that is deeply shaped by institutional, economic and socio-political contexts.

The comparative case study design employed in this thesis aims to examine the institutional complexity while also allowing for systematic comparison between the two cases. Through the comparison between rather similar countries - both being economically developed democracies - the analysis also aims to explain why countries with similar socio-economic and political circumstances produce different social outcomes.

Additionally, the thesis draws on document-based policy analysis. Government reports, national SDG implementation strategies, legislative frameworks, policy statements, welfare programme documentation, and reports from international organisations are analysed in order to assess how food insecurity and the right to food are framed politically and institutionally in each country. The approach is particularly appropriate given the thesis' focus on governance, institutionalisation, and norm implementation.

It is important to note that this research does not seek universal conclusions applicable to all countries in the Global North. Instead, it aims to contribute analytically to understanding how differing welfare traditions and relationships to international human rights frameworks shape national approaches to SDG 2 and food insecurity.

The selection of the United States and France as cases follows a "most similar systems" logic commonly used in comparative political science. Both countries are economically advanced democracies in the Global North with substantial fiscal capacity, advanced state institutions, and significant influence within international governance systems. At the same time, they differ considerably in terms of welfare state structure, political culture, approaches to social protection, and engagement with international human rights frameworks. The justification behind choosing the United States and France is due to the similarity in their systems design as they both enjoy prosperous economies but yield different outcomes from it due to different systemic conditions.

France is commonly associated with a more comprehensive welfare state model characterised by stronger redistributive mechanisms, broader public service provision, and a stronger state role in social protection. In contrast, the United States is generally associated with a more liberal welfare model that places greater emphasis on market mechanisms and targeted rather than universal welfare provision. These differences provide an analytically useful contrast for examining how institutional arrangements shape responses to food insecurity and the implementation of SDG 2.

The comparison is also relevant from the perspective of international norm implementation. France has historically embraced multilateralism and international human rights frameworks more explicitly in its domestic policy discourse, while the United States has traditionally been more avoidant regarding the incorporation of economic and social rights into binding domestic legal frameworks. This divergence allows the thesis to examine whether differing levels of engagement with international human rights norms influence domestic approaches to food insecurity and welfare provision. Furthermore, both countries additionally exert significant political and economic influence within international governance systems, making their approaches to SDG implementation particularly relevant for broader debates surrounding welfare governance and human rights institutionalisation in the Global North.

The comparative case study approach further allows for contextual depth that would not be possible in broader quantitative cross-country studies. Food insecurity is shaped by highly context-dependent institutional arrangements, including welfare eligibility criteria, food assistance systems, labour market structures, housing affordability, migration governance, and healthcare access. A focused comparison therefore enables a more nuanced understanding of the structural and political causes of hunger in affluent societies. To allow for an in-depth and focused analysis, the research will be limited to the policies, projects and statements undertaken by the governments of the countries.

The study also recognises that food insecurity is politically constructed and measured differently across countries. Definitions of poverty, hunger, food insecurity, malnutrition, and vulnerability may vary between international organisations and domestic institutions. Consequently, comparing France and the United States also provides insight into how states

conceptualise and govern food insecurity differently despite operating within the same broader SDG framework.

4.2 Data Collection and Sources

The thesis relies primarily on qualitative document analysis using both primary and secondary sources. The central focus is placed on official governmental and institutional documentation in order to examine how food insecurity and the right to food are addressed politically and institutionally. The primary sources are made up of documents and data retrieved from websites run by the governments of the United States and France that discuss food security and availability, as well as from websites of organisations working alongside the government to achieve goals relating to food security. Furthermore, primary sources relating to the 2030 World Agenda and aligning with the SDGs, particularly SDG 2, will be analysed. The primary sources that will be examined include government policy documents, reports from public agencies, international treaty documents, publications by national human rights institutions, and articles from news websites on decisions taken by political leaders.

The thesis places a particular emphasis on official government sources due to the relative lack of extensive comparative literature specifically examining hunger in the Global North through the lens of SDG 2 and welfare governance. Official documents are therefore essential for understanding how states themselves frame policy objectives, institutional responsibilities, and compliance with international frameworks.

In addition to the primary sources, the secondary sources that will be studied consist primarily of academic literature relating to food security, welfare state theory, international human rights law, SDG governance, social policy, and food justice.

The secondary sources will include academic writings about the mechanics and obstacles regarding achieving SDG 2, as well as writing relating to each country's respective welfare regime. The use of multiple source types, including governmental reports, international organisation documents, and academic literature, also allows for a degree of source triangulation and helps reduce overreliance on official state narratives.

The temporal scope of the research primarily focuses on the post-2015 period following the adoption of the 2030 Agenda for Sustainable Development. This timeframe was selected because the thesis specifically investigates the implementation of SDG 2 within the context of the Sustainable Development Goals framework rather than the earlier Millennium Development Goals. Nevertheless, where historically relevant, earlier policy developments and welfare structures are discussed in order to contextualise current institutional arrangements.

To ensure both analytical relevance and feasibility within the scope of this thesis, included documents were selected based on their relevance in regards to SDG 2 and food security, their relation to welfare provision or human rights implementation, and their relevance to both international and domestic institutions in France and the US.

In order to maintain the scope of the study and ensure that the research remains focused on governance structures, welfare systems, and institutional implementation, this thesis excludes studies that observe technical agricultural production, as well as literature that solely focuses on economic modeling without any institutional or political components.

In the writing of this thesis, artificial intelligence has been utilised to complement the research and find data on the status of food security and the right to food in the United States and France. More specifically, the AI tool Chatgpt's regular and "Deep Research" functions were utilised exclusively in some subchapters in Chapter 5. In order to combat the limitations of this tool, such as inaccurate information, false citations, and unnecessary repetition, all information and sources provided were verified, and no direct writing was copied.

4.3 Method of Analysis

The thesis employs thematic qualitative analysis in order to identify recurring institutional, political, and normative patterns within the selected cases. Thematic analysis was selected because it allows for systemic interpretation of qualitative material while still permitting flexibility in analysing complex political and institutional phenomena. The method enables the identification of recurring themes across policy documents, governmental reports, and

institutional frameworks, especially regarding the implementation of SDG 2 and the framing of food insecurity.

The analysed themes were deduced on the basis of the theoretical framework presented in Chapter 3: the analysis was particularly guided by Risse and Sikkink's Spiral Model, the Welfare Regime Theory, and the Social Origins Theory.

The Spiral Model is used analytically to assess how international human rights norms relating to food and social protection are incorporated into the domestic political discourse and institutional practice. Particular attention is paid to the extent to which governments frame food security as either a humanitarian issue, a welfare issue, or a rights-based obligation.

Meanwhile, both the Welfare Regime Theory and the Social Origins Theory are employed to interpret how different welfare structures shape state responses to food insecurity. The theories are not treated as rigid explanatory frameworks but rather as analytical tools for understanding differences in governance structures, institutional responsibilities, and relationships between the state and civil society.

Using theories from both international relations and political science will provide a well-rounded perspective on the motives and behaviours of the two selected countries when it comes to welfare provision and aligning with international norms. The analysis therefore combines institutional analysis with interpretive policy analysis in order to understand both formal governance arrangements and the broader political logic underpinning them.

4.4 Operationalisation of Key Concepts

Several central concepts used throughout this thesis require operational clarification due to their broad and contested nature within the literature.

Firstly, "food insecurity" is understood not merely as the absence of food, but as limited or uncertain access to adequate, safe, nutritious, and culturally appropriate food. The thesis

adopts a multidimensional understanding of food security consistent with the FAO framework, encompassing 1) availability, 2) access, 3) utilisation, and 4) stability[84]

Secondly, "hunger" is understood as a severe manifestation of food insecurity involving insufficient caloric intake or inability to consistently access adequate nutrition[85]. However, the thesis recognises that hunger in the Global North often manifests differently than in contexts of famine or humanitarian crisis and is frequently linked to poverty, exclusion, and welfare gaps rather than food scarcity itself.

The concept of the "right to food" refers to internationally recognised human rights norms derived primarily from the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, as well as the broader UN human rights framework.

Within this thesis, institutionalisation refers to the process through which international norms are incorporated into domestic policies, governance structures, legal frameworks, and administrative practices.

"Compliance" with SDG 2 does not imply full achievement of zero hunger, but rather refers to the degree to which states align policies with the objectives of SDG 2, as well as proper engagement with international reporting mechanisms. In addition, it includes the integration of food security goals into their domestic governance frameworks.

Finally, "welfare provision" refers broadly to state-supported systems intended to reduce social vulnerability and guarantee minimum living standards, including food assistance programmes, income support, healthcare access, and social services.

4.5 Analytical Positioning, Limitations, and Researcher Reflexivity

This thesis is positioned within interpretive and constructivist traditions in political science and international relations. The thesis is based on the notion that food insecurity is not solely

[84] Food and Agriculture Organization of the United Nations, *An Introduction to the Basic Concepts of Food Security*.
[85] Food and Agriculture Organization of the United Nations, "Putting a Number on Hunger: Different Measures for Different Purposes."

an economic phenomenon but also a socially and politically constructed issue shaped by institutional norms, welfare ideologies, as well as governance frameworks.

The research additionally draws on constructivist understandings of international norm diffusion, particularly regarding the institutionalisation of human rights norms within domestic policy systems. This perspective is particularly relevant considering the thesis' engagement with the Spiral Model and broader debates surrounding the relationship between international human rights frameworks and national sovereignty. At the same time, this thesis incorporates elements of comparative welfare state analysis and policy studies, recognising that institutional structures strongly shape the implementation of social protection and food security measures.

In sum, the research aims to occupy an interdisciplinary position between comparative political science, international relations, social policy and human rights studies in order to assess the complex interdependencies regarding achieving "zero hunger" and SDG 2.

The justification behind not using alternative methods and types of data concern the type of analysis this thesis intends on undertaking. The thesis intentionally priorities depth over breadth. While this enables detailed institutional analysis, it also creates some limitations. Firstly, the study focuses exclusively on two countries and therefore cannot be fully generalised to all countries in the Global North or to all approaches toward food insecurity and SDG implementation. Secondly, the research relies heavily on publicly available governmental and institutional documents. Such sources may contain political bias, selective reporting, strategic framing, or window dressing designed to present policies more favourable. Consequently, official reporting may not always fully reflect the lived experiences of food insecurity or the effectiveness of policy implementation. Thirdly, differences in statistical measurement and terminology between France, the United States, and international organisations create challenges for direct comparison. Concepts, such as hunger, food insecurity, poverty, and social exclusion are operationalised or interpreted differently across institutions.

The thesis is also constrained by temporal developments. Food insecurity remains strongly affected by rapidly changing economic and political conditions, such as, but not limited to, inflation, geopolitical conflicts, climate-related disruptions, the global shift to the right-wing,

and the long-term consequences of the COVID-19 pandemic. Consequently, domestic policy is experiencing turbulence in both case study countries.

Finally, this thesis does not include self-conducted interviews or fieldwork. Such methods could provide additional insights into lived experiences and policy implementation; however, given this thesis' focus on institutional analysis and policy implementation at the state level, document analysis was considered more appropriate than interview based methods or fieldwork within the scope and timeframe of this thesis.

As with all qualitative research, interpretation is inevitably shaped by the researcher's analytical perspective, theoretical orientation, and selection of sources. This thesis acknowledges that document-based policy analysis involves interpretive judgement regarding which themes, institutional dynamics, and policy developments are considered most analytically significant. Furthermore, the selection of documents greatly depended on the available information on different organisations' websites, as well as information on the governments' respective websites. The thesis also recognises that governmental and institutional documents often reflect official narratives and political priorities. Consequently, the analysis attempts to balance institutional perspectives with critical academic literature and international reporting where possible.

Rather than claiming complete objectivity, the research adopts a reflexive qualitative approach that acknowledges the role of interpretation while striving for analytical transparency and methodological consistency. The theoretical framework employed in Chapter 3 will provide a structured lens through which the material is analysed, helping to ensure coherence across the comparative analysis.

Finally, this thesis adopts a critical perspective toward the assumption that economic prosperity alone guarantees food security. This perspective informs the broader analytical objective of examining why hunger persists even within highly developed welfare states and advanced economies.

5. Case Study: The United States of America and France

The second sustainable development goal ambitiously aims to "end hunger and all forms of malnutrition by 2030". However, the mechanisms behind achieving such a feat remain

incredibly complex and require strong direction and well-planned policy implementation. Thus, this chapter will consist of a case study aimed at comparing and contrasting the approaches conducted by the United States of America and France.

The first area in need of comparison is their current economic situation, especially regarding their gross domestic product (GDP), and statistics on poverty, wealth gaps, and spending. Moving forward, the countries' normative commitment to the right to food and the methods regarding how the right to food is both institutionalised and operationalised will be explored on multiple levels, including the national, international, and supranational if applicable. Furthermore, it is important to observe the welfare models that both countries follow in order to better understand why each state adopts the laws and policies it does to achieve food security for all.

As governments cannot achieve their objectives regarding food security in a vacuum, the role of non-state actors needs to be explored. This could include civil society organisations (CSOs), NHRIs, non-governmental organisations (NGOs), as well as other entities that support the achievement of zero hunger such as charitable organisations and advocacy groups. It is also worth asking what role do non-state actors play in achieving this goal; do they fill a gap left by the government? Or does the government initiate partnerships with non-state actors to achieve their objectives?

Lastly, the aspect of multi-level governance and the competences of each level will also be brought forward in order to outline the influence of international organisations, conventions, and recommendations. Through observing this influence, it is possible to pinpoint where both countries are situated in Risse and Sikkink's spiral model and in turn somewhat measure each country's stance and commitment towards the SDG 2 and international human rights rhetoric regarding the right to food.

5.1 The United States and France: an overview

5.1.1 The United States

According to the World Bank, the United States boasted a GDP of 28.75 trillion USD in 2024[86], putting the country at the top in terms of economic prowess. The GDP per capita is 84,534 USD, cementing the country as a very high income country. When looking into the country's economic conditions, it is observable that the US's economy is diverse, developed, and largely led by a competitive and innovative private sector. The US contains some of the world's largest and most successful corporations, especially in the technological sector. In addition, there is a current shift in the US towards service-based economy in finance, healthcare, education, and entertainment. The US is both a large importer and exporter of goods and services, but is currently turning to implementing protectionist policies and is resisting joining trade-related multi-lateral agreements and is locked in a trade war and technology race with China. This is largely caused by the return of President Donald Trump, who has committed to lowering government spending, strengthen the country's sovereignty by drawing away from international obligations and increasing trade restrictions[87].

Despite its economic strengths, there are some weaknesses resulting from the US' economic system, as income inequality is the highest among countries with similar economic strengths, which led to a great societal divide among the affluent communities versus those in need. Moreover, President Donald Trump's approach to reducing the size of bureaucratic entities has caused rips in the provision of social services[88]. According to a national census, the percentage of individuals recorded to be living in poverty in 2024 was recorded to be 10.6%, equalling to 35.9 million individuals. Moreover, when it comes to the wealth gap, the US exhibits the widest gap between rich and poor individuals in the country among all countries in the Global North, with the richest 12 individuals' net worth exceeding 2.7 trillion USD, while poorer inhabitants in the country fall into debts[89] [90].

The United States is one of the only major democracies in the world without an accredited NHRI. Human rights oversight operates differently in the United States. Firstly, instead of a single institution, they rely on a fragmented system of CSOs and independent government agencies such as the US Commission on Civil rights to take care of specific civil rights issues. Domestic civil society groups in the US as well as the international community are

[86] World Bank, "GDP - United States."
[87] Focus Economics, "United States Economic Forecasts, Data & Projections."
[88] Focus Economics, "United States Economic Forecasts, Data & Projections."
[89] Shrider and Bijou, *Poverty in the United States: 2024*.
[90] Inequality.org, *Wealth Inequality in the United States*.

continuously lobbying the federal government and the administration to establish a proper NHRI in the country to monitor, document, and enforce human rights commitments[91]. The most prominent is the "Campaign for an NHRI in the USA", which is prioritising the US administration to set up a one-year Study Commission to explore the establishment of an NHRI. They have continuously provided shadow reports to the UN Human Right Committee, reached out to prominent politicians, and joined the effort in sending a congressional letter to President Biden to call for the US to establish an NHRI. However, upon inspecting the website for the campaign, it seems that it has been largely inactive since the end of 2023[92].

5.1.2 France

On the other hand, France had a GDP of 3.16 trillion USD in 2024[93], also one of the largest economies in the world. The GDP per capita is 46,103 USD. The country's economic condition is also diverse, with key sectors including manufacturing, aerospace, and luxury goods. Moreover, France has a robust service sector due to its success in tourism and finance. Lastly, France's agriculture sector is also renowned, especially when looking at wine and dairy products. Paris is one of the key financial sectors in the European Union, even more so after it has taken on the financial activity occurring in London after the United Kingdom's departure from the EU. As a founding member of the European Community, France acts as a leading power in the EU, and has a strong hand in shaping its policy. President Emmanuel Macron, who has been in office since 2017, advocates for EU integration and enlargement in order to strengthen the region. Moreover, President Macron's economic vision involved liberalisation of the market up until 2024 as well as other measures that have ensured the reduction of unemployment in the country. The period of liberalisation has recently ended due to social upheaval and strikes[94].

Domestic challenges in France come from its high public debt, which amounts to over 100% of the country's GDP. Furthermore, France is historically resistant to any structural reforms which often leads to large-scale protests that interfere with the country's economic activity. In addition, France's strong alignment with the EU has caused some disparities in economic development and the integration of migrants into the labor market is still a challenge. Lastly,

[91] Davis, "Institutionalizing Human Rights in the United States."
[92] Campaign for an NHRI in the USA, "Campaign for an NHRI in the USA."
[93] World Bank, "GDP - France."
[94] Focus Economics, "France Economic Forecasts, Data & Projections."

succeeding in policymaking in France is a challenge due to their fragmented parliaments with different political alignments holding similar proportions of the national parliament[95]. According to the French National Institute of Statistics and Economic Studies, poverty in 2023 peaked at 15.3%, or roughly 10 million individuals, and the gap between the wealthy and the poor is continuing to get wider[96]. In this case, an individual was considered to be living in poverty if they had 60% or less of the median income[97].

The NHRI in France is called the French National Consultative Commission on Human Rights (Commission National Consultative des Droits de l'Homme- CNCDH). It was established in 1947 in Paris and is the oldest NHRI in the world. Their role is to advise and make proposals to the government, observe the effectiveness in France of the rights protected under international human rights conventions, and contribute to the work of UN human rights bodies and to the UPR. They also raise public awareness on human rights by organising training sessions and public events. They currently hold the "A" accreditation status and have a wide mandate including equality, racism, implementation of international humanitarian law, and corporate social responsibility[98].

In addition to the CNCDH, France has several other entities tasked with safeguarding human rights. The Défenseur des Droits (Defender of Rights) is an independent constitutional authority that defends individual rights and freedoms, ensures equal access to rights, and protects whistleblowers[99]. In addition, the Controller-General of Places of Deprivation of Liberty prevents human rights violations in prisons, police stations, and other detention centers[100]. Lastly, the National Commission on Informatics and Liberty focuses on protecting digital rights and freedoms[101].

5.1.3 Comparing the Two States

[95] Focus Economics, "France Economic Forecasts, Data & Projections."
[96] Insee, "Standards of Living and Poverty in 2023."
[97] Ané, "Poverty and inequality in France reach highest levels in 30 years."
[98] European Network of National Human Rights Institutions, *French National Consultative Commission on Human Rights - ENNHRI*.
[99] Défenseur des Droits Republique Francaise, "The Defender of Rights."
[100] Contrôleur Général des Lieux de Privation de Liberté, "The 'Contrôleur Général Des Lieux de Privation de Liberté' Ensures Respect for the Fundamental Rights of Persons Deprived of Their Liberty."
[101] Commission Nationale de l'Information et des Libertés, "CNIL."

When observing the poverty rates in both countries, it is important to note that the definitions of poverty might differ from one country to another. However, obtaining data from a source where the definitions for poverty and inequality are standardised, the perception of poverty in both countries becomes clearer. The World Bank outlines several types of poverty in its data, for the purposes of this thesis, we will be observing three. The first type of poverty to consider is extreme poverty, where it is currently defined as surviving with less than 3 USD a day, according to the purchasing power parity of the US dollar in 2021[102], in turn meaning that access to food and healthcare is extremely limited. The extreme poverty rate in the US is at 1.1% of the population as of 2024[103], while the rate in France is at 0.07% of the population as of 2023[104]. Another aspect of poverty worth considering is multi-dimensional poverty, which is a broader poverty measure that considers factors beyond monetary deprivation by including other factors such as access to education, adequate living standards, and healthcare. The Multidimensional Poverty Index (MPI) was developed by the UNDP and aims to integrate the extreme poverty line with the previously mentioned dimensions to poverty[105]. The multidimensional poverty rate for both countries are at around the same level, with the US having a poverty rate of 1.28%[106] and France having a slightly lower rate of 1.26%[107]. Lastly, the Gini coefficient is a commonly used measure of economic inequality. The Gini coefficient is a measure used to represent different aspects of inequality, such as income and wealth inequality, within a group. The inequality is measured such that 0 (0%) represents complete equality within a group, and 1 (100%) represents the polar opposite. World Bank data shows that the United States has a Gini coefficient of 0.418 (41.8%), and France having a Gini coefficient of 0.318 (31.8%)[108].

5.2 Recognition of the Right to Food

One of the key measures that will greatly impact the commitment to achieving food security is the recognition of the right to food. According to the Special Rapporteur on the Right to Food, the right to food is defined as “the right to have regular, permanent, and unrestricted access, either directly or by means of financial purchases, to quantitatively and qualitatively

[102] United Nations, “Goal 1: End Poverty in All Its Forms Everywhere.”
[103] World Bank, “Country Profile - United States.”
[104] World Bank, “Country Profile - France.”
[105] World Bank, “Multidimensional Poverty Measure.”
[106] World Bank, “Country Profile - United States.”
[107] World Bank, “Country Profile - France.”
[108]World Bank, “World Bank Open Data Gini Index.”

adequate and sufficient food corresponding to the cultural traditions of the people to which the consumer belongs, and which ensure a physical and mental, individual and collective, fulfilling and dignified life free of fear"[109]. Michael Fakhri, the Special Rapporteur on the Right to Food, has stated that access to food should not be determined by corporations, and has urged all countries to recognise food as a human right. The UN General assembly has frequently met to vote on the status of food as a human right, with the vast majority of countries voting in favor[110].

The US Constitution does not contain any provisions pertaining to the right to food. They have signed the ICESCR in 1977 but have not since ratified it[111]. Despite international pressure, the US has consistently voted against the recognition of food as a human right. Fakhri has expressed his disappointment with how the US understands rights and the government's role in providing basic necessities and has further elaborated on the role racism plays in the USDA's failure to prevent indigenous and black communities from falling deeper into poverty[112]. In 2017, the US mission in Geneva provided a statement in front of the Human Rights Council to reaffirm their position regarding the right to food and explain why they voted against recognising the right to food. In which, the US stated that while they do recognise every individual's rights to an adequate standard of living as outlined in the UDHR, they are unable to accept the resolution on the recognition of the right to food due its lack of clarity and accuracy. The US emphasised as they have not ratified the ICESCR, they are not under obligations to recognise and enforce international norms and policies in relation to second generation human rights. They have concluded this statement by reaffirming their goals to improve access to food, but do not accept any obligations arising from recognising the right to food and thus will not do so[113].

The United States' aversion to the recognition of the right to food is part of a wave of withdrawals from international organisations, conventions, and treaties that are deemed not in alignment with the interests of the United States by President Trump. In January of 2026, the president released a memorandum for the heads of executive departments and agencies in the

[109] United Nations Human Rights Office of the High Commissioner, "About the Right to Food and Human Rights."
[110] United Nations Digital Library, *The Right to Food*.
[111] Food and Agriculture Organization of the United Nations, "USA | The Right to Food around the Globe | Food and Agriculture Organization of the United Nations."
[112] Namkung, "UN Hunger Expert."
[113] U. S. Mission Geneva, "U.S. Explanation of Vote on the Right to Food."

US informing them about upcoming withdrawals from over 60 multi-lateral and international entities, organisations, and funds. Withdrawals of US funding for these entities and funds will cease as well[114]. Not included in this memorandum is President Trump's previous withdrawals from the World Health Organisation (WHO)[115], the UN Human Rights Council[116], UNESCO[117], and several other international organisations. These acts of withdrawal are a strong indicator of the current attitude towards the internationalisation of human rights in the US as the country continues to isolate itself.

On the other hand, while not explicitly guaranteeing the right to adequate food in its constitution, the French Republic has signed and ratified the ICESCR in 1980 as well as its Optional Protocol in 2015. Furthermore, in Article 55 of the French constitution under National Status of International Obligations, it is stated that "Treaties or agreements duly ratified or approved shall, upon publication, prevail over Acts of Parliament, subject, with respect to each agreement or treaty, to its application by the other party." Moreover, France repeatedly votes in favor for the recognition of the right to food in the UN General Assembly. In several UN resolutions concerning the right to food, including the 2015 resolution on the right to food, France voted in favor alongside the overwhelming majority of UN member states. These expressions of commitment give international human rights instruments a stronger legal standing within the French legal system. France's constitutional framework therefore reflects a greater openness to the internationalisation of economic and social rights, including the right to food. In practice, France's recognition of social and economic rights has also influenced its domestic welfare policies. The French social model places significant emphasis on state responsibility in guaranteeing a minimum standard of living through social protection systems, public healthcare, unemployment assistance, and food aid programs that will be explored in further subchapters.

Nevertheless, despite France's favorable position toward the right to food in international law, criticism remains regarding the extent to which this right is fully enforceable in practice. Since the right to food is not explicitly guaranteed within the French Constitution, individuals face limitations when attempting to invoke it directly before domestic courts. It is also worth

[114] Presidential Memoranda, "Withdrawing the United States from International Organizations, Conventions, and Treaties That Are Contrary to the Interests of the United States."
[115] U. S. Mission Geneva, "Termination of U.S. Membership in the WHO."
[116] The White House, "Withdrawing the United States from and Ending Funding to Certain United Nations Organizations and Reviewing United States Support to All International Organizations."
[117] UNESCO, "Withdrawal of the United States of America from UNESCO."

noting that growing poverty, inflation, and rising food insecurity in recent years have exposed shortcomings in France's welfare system and demonstrated that legal recognition alone is insufficient without more effective implementation mechanisms. Reports from humanitarian organisations have shown increasing reliance on food aid even within a country such as France that strongly supports socioeconomic rights internationally. Thus, while France presents a far more favorable legal and political approach towards the recognition of the right to food, challenges remain in translating international commitments into fully realised social protections for all residents[118][119].

In March 2026, the CNCDH adopted its first major comprehensive opinion on the right to food titled "Avis pour le droit à une alimentation saine, durable et choisie" meaning the Opinion on the right to healthy, sustainable, and chosen food. The CNCDH framed food as a human rights issue related to human dignity, social justice, public health, environmental sustainability, and equality. The CNCDH also called for the constitutional recognition of the right to food, as it already exists in international law and France has ratified the relevant treaties that recognise it. They state that the current French food-related policies are fragmented, sectoral, and insufficiently coordinated[120].

5.3 Food Security: In Implementation

Food security has become an increasingly important policy concern in both the Global North and the Global South, particularly as economic inequality, inflation, climate change, and geopolitical instability continue to disrupt global food systems. While food security is often associated with food availability, the concept extends far beyond production alone and encompasses economic access, nutritional quality, stability, and sustainability. According to the definition adopted by the Committee on World Food Security (CFS) in 2012, food security exists when all people, at all times, have physical, social, and economic access to sufficient, safe, and nutritious food that meets their dietary needs and preferences for an active and healthy life[121]. The Global Food Security Index (GFSI) was created as a measurement tool in order to assess the effectiveness and resilience of national food systems.

[118] United Nations Digital Library, "The Right to Food," March 4, 2023.
[119] Knuth and Vidar, *Constitutional and Legal Protection of the Right to Food around the World*.
[120] Commission nationale consultative des droits de l'homme, République Francaise, "Avis pour le droit à une alimentation saine, durable et choisie."
[121] Committee on World Food Security, *Coming to Terms with Terminology*.

The GFSI evaluates countries across multiple dimensions, including affordability, availability, quality, safety, sustainability, and resilience, thereby offering a comprehensive understanding of how states perform in ensuring food security for their populations. Although countries such as the US and France rank effectively high, both continue to experience food insecurity and nutritional inequality among vulnerable populations[122].

5.3.1 The United States

Countries in the Global North have had different approaches when it comes to addressing low food security. The United States had introduced measures such as issuing food assistance through the long-running SNAP programme[123]. SNAP is a federally funded and state administered programme designed to help individuals living in poverty pay for food. In 2024, the SNAP programme served an average of 41.7 million people on a monthly basis, that is 12.3% of the population residing in the country[124]. SNAP was proven to lift families out of poverty, reduce food insecurity, lower healthcare costs, and also significantly support local economies by supporting local markets and farmers[125]. Under the "One Big Beautiful Bill" Act passed in 2025, SNAP funding has been reduced by 20% over the next 10 years, that amounts to approximately 186 billion USD being cut from this food assistance programme. The slash in support will be executed by imposing stricter requirements in order to be eligible to receive SNAP benefits, and limits the time they are allowed to receive them as well[126].

In addition to SNAP, the government provides food assistance through the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) programme. Women that are pregnant, breastfeeding, or have recently given birth can qualify for this programme depending on their income, health, and where they reside. Similarly to the SNAP, the WIC program is also enduring severe slashes in financing due to President Trump's measures on reducing government spending on food assistance programs[127].

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[122] The Economist, "Global Food Security Index (GFSI)."
[123] Smil, *The History and Future of Food: How to Feed the World*, 1st Printing 2025.
[124] U.S. Department of Agriculture, "Percent of Population Receiving SNAP Benefits in Fiscal Year 2024 | Economic Research Service."
[125] Harvard Kennedy School, "Explainer: Understanding the SNAP Program—and What Cuts to These Benefits May Mean."
[126] Harvard Kennedy School, "Explainer: Understanding the SNAP Program—and What Cuts to These Benefits May Mean."
[127] National WIC Association, "National WIC Association Denounces Trump's Proposed Cuts to WIC's Fruit and Vegetable Benefits."

The US government also provides school meals and food programmes for children that qualify for free or reduced-price meals at their school or childcare center through the National School Lunch Programme, the School Breakfast Programme, and the Special Milk Programme. Children in families that receive food assistance through SNAP, WIC, and other welfare programmes can qualify to receive food at school through the abovementioned programmes[128].

The US Department of Agriculture (USDA) defines two important components of food security, where low food security is defined by the reduction of quality and variety of one's diet, likely caused by not being able to afford a balanced and nutritious meal, but the volume of food eaten is not affected. Meanwhile, very low food security is caused by a limited budget for food, and leads to individuals and families skipping meals and eating below the recommended calorie intake.

According to the USDA, 13.5% of US households, or 47.4 million people experienced food insecurity throughout 2023, increasing from 12.8% in the previous year. The households experiencing moderate to low food insecurity had to resort to eating less varied diets and participating in federal food assistance programs or community food pantries in order. In households experiencing very low food security, eating habits were disrupted and led to reduced food intake due to insufficient funds, households experiencing very low food security in the US at some time during 2023 were 5.1% (12.2 million adults) unchanged from the previous year. Breaking down the data further, it is observable that 7.2 million children lived in food insecure households, and 841,000 children lived in households that experienced very low food security[129].

[128] United States Government, "School Meals and Food Programs for Children."
[129] U.S.U.S. Department of Agriculture, "Food Security in the U.S. - Key Statistics & Graphics | Economic Research Service."

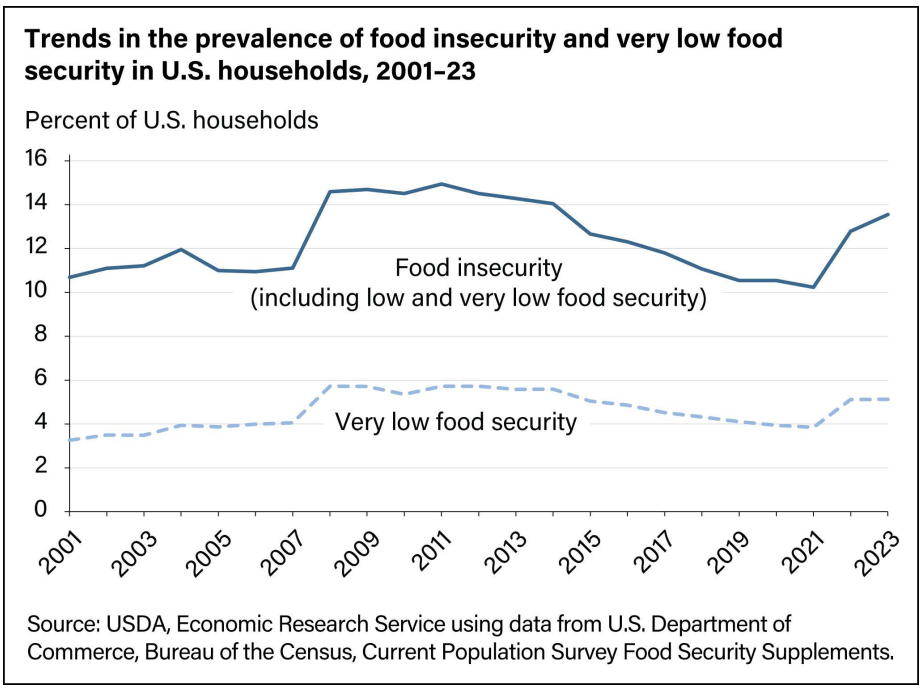


Figure 4: Graph Depicting the Trends of Food Security in the US

When observing the trends of food insecurity in the US from 2001 to 2023, it is evident that progress is somewhat stagnant, with an observable decrease from 2015 until 2021, when it rises to levels similar to 2008, where it presumably spiked due to the economic crisis. The decline starting in 2015 coincides with the beginning of the 2030 World Agenda, while the spike in 2021 is very likely from the economic shocks caused by the COVID-19 pandemic.

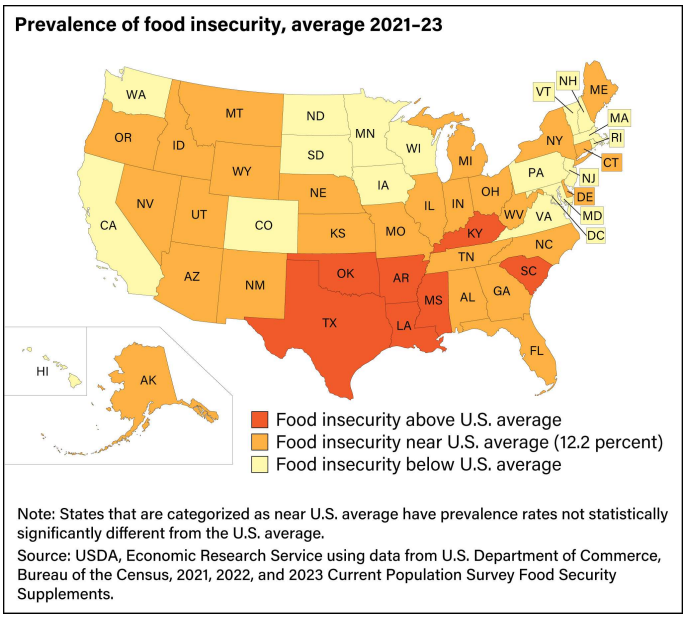


Figure 5: Chart depicting the prevalence of food security in the US between 2021 and 2023

Food insecurity in the US is evidently clustered in the southern area of the country, with states like Texas, Mississippi, and Louisiana experiencing food security above the average level in the US. Meanwhile, states like California, Washington, as well as states in the upper midwest area and the east coast have food insecurity that is lower than the national average[130].

According to the Food Research and Action Center, food insecurity rates were significantly higher for black and latinx households (24.4% and 20.2% respectively). Meanwhile the rate of white, non-latinx households was significantly lower at 10.1%. Furthermore, urban and rural areas are more likely to experience food security in comparison to suburbs[131].

The US Department of Health and Human Services outlines the different factors that may lead to food security, which include issues regarding income and employment, ethnicity, disability, and the health care expenses caused by disability. The department also outlines that the main factor causing food insecurity is when there is not enough money to purchase food items[132]. Food insecurity has also been linked to limited access to nutritious food, residential segregation, and other issues stemming from affordable housing, which further emphasises how racial disparities negatively disadvantage persons of color on a wide variety of issues in the US, and were further exacerbated by the COVID-19 pandemic[133].

The root causes for food security are largely economic due to high and rising rent and food prices. The struggles stemming from food security led to increased rates of obesity, diabetes, and other health and psychological conditions. When looking at the existing barriers, access is the most important. Access does not only look at the physical distance to markets, but also the prices of foods, especially considering that healthier foods overall cost more than unhealthier and faster alternatives. The 2021 USDA Thrifty Food Plan recognises the multi-faceted issues behind access, and has thus increased food welfare benefits under SNAP. Another aspect in need of consideration is the idea behind “food choice”, which is also impacted by socioeconomic standing as the price of healthier food and the time it takes to prepare it lead to large opportunity cost[134]. It is important to consider that lower-priced foodstuffs are often processed and full of added sugar, fats, sodium, and offer very little

[130] U.S. Department of Agriculture, “Food Security in the U.S. - Key Statistics & Graphics | Economic Research Service.”
[131] Food Research & Action Center, “Hunger & Poverty in America.”
[132] Carlson et al., “Measuring Food Insecurity and Hunger in the United States.”
[133] Drewnowski, “Food Insecurity Has Economic Root Causes.”
[134] Drewnowski, “Food Insecurity Has Economic Root Causes.”

nutritional value, leading to overnutrition being the leading form of malnutrition in the United States[135].

While limited, there are growing efforts in the US advocating for food sovereignty. It is primarily advanced through grassroots organisations, farmer coalitions, indigenous movements, and food justice networks that challenge the dominance of industrial agriculture and corporate control over food systems. Instead, these movements call for localised food production, ecological farming, democratic control over agriculture, and the right of communities to define their own food systems. One of the most significant entities is the US Food Sovereignty Alliance (USFSA). This alliance brings together food producers, labour groups, charitable organisations, and environmental activists among others to advocate for equitable and sustainable food systems. The USFSA defines food sovereignty as the right to healthy and culturally appropriate food produced through ecologically sound methods while emphasising democratic control over food systems and resistance to corporate agribusiness[136]. Through organisations such as the National Family Farm Coalition, US activists advocate for small-scale farming, seed sovereignty, land rights, and agroecological agriculture as alternatives to industrial food systems[137]. Overall, while the US does not yet have an established national food sovereignty framework, grassroots advocacy demonstrates an increasing push towards local resilience, sustainability, and democratic control of food systems as alternatives to industrial agriculture and corporate food governance.

5.3.2 France

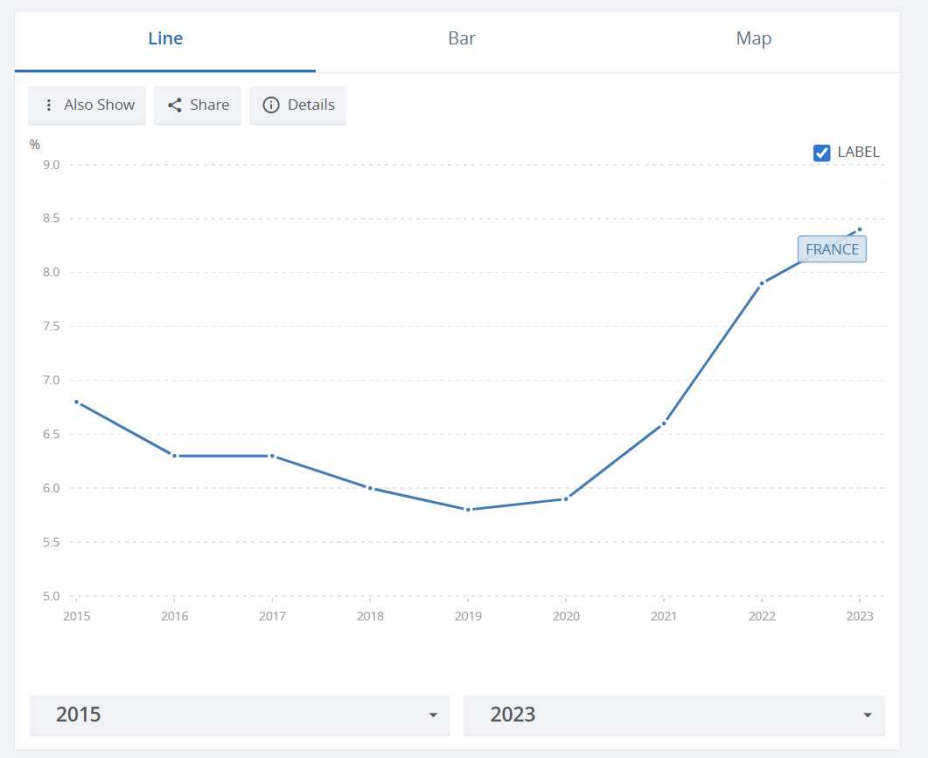
When it comes to food security, France shares the definition that was adopted by the CFS in 2012, which states that "Food and nutrition security exists when all people, at all times, have physical, social, and economic access to sufficient, safe, and nutritious food which meets their dietary needs and food preferences for an active and healthy life[138]." To support this, France identified four pillars that are crucial to achieve food security: 1) physical, economic,

[135] Emmerich et al., "Obesity and Severe Obesity Prevalence in Adults: United States, August 2021–August 2023."
[136] U.S. Food Sovereignty Alliance, *The U.S. Food Sovereignty Alliance*.
[137] National Family Farm Coalition, "Food Sovereignty."
[138] Ministère de l'Europe et des Affaires étrangères, "Food Security, Nutrition and Sustainable Agriculture | France Diplomatie."

and social access 2) availability 3) sanitary and nutritional quality and 4) regular access, availability, and quality[139].

France is the European Union's leading force when it comes to agriculture as it produces around 20% of the agriculture output, and the amount of food produced is sufficient to feed the entire population of the country. However, hunger and food security persist to an extent in France, where it affects around eight million people, which is 20% of the population. It is stated that almost 20% of French households struggle to pay for their children's school lunches, and that over a quarter of households cannot afford fresh produce, meat, and fish[140].

Food waste is a present issue in France, where ten million tonnes of food is wasted every year, which equates to a third of its agricultural output. Furthermore, food items that have experienced a drop in price are often thrown away rather than distributed. Consumers and producers are almost equally to blame for food waste (33% and 32% of food waste respectively), as it is estimated that every individual wastes 30 kilograms of food every year[141].



[139] Ministère de l'Europe et des Affaires étrangères, "Food Security, Nutrition and Sustainable Agriculture | France Diplomatie."
[140] Elie, "Hunger in France's Land of Plenty."
[141] Elie, "Hunger in France's Land of Plenty."

Figure 6: Graph depicting the rate of food insecurity in France 2015-2023[142]

Food insecurity in France was recorded to be at about 8.4% in 2023, that is 2% more than it was before the COVID-19 pandemic. Similarly to the United States, there was an observable drop in food security from 2015 until 2020, where it steadily increased again.

5.3.3: The US and France: A Comparison

Figure 7: US progress on SDG 2[143]

Figure 8: French progress on SDG 2[144]

Both maps above outline all the indicators under SDG 2 and both the US' and France's status on achieving them. When it comes to the countries' alignment with SDG2: Zero Hunger, both countries have yielded mixed results according to the 2025 Sustainable Development Report. Both France and the US have succeeded at reducing undernourishment and the effects it has on children. However, the US has not succeeded as France did at reducing the prevalence of obesity, in fact there is an observable regression as more individuals in the US are exposed to overnutrition. Moreover, both countries experienced difficulties when it comes to improving the human trophic level, meaning that the average diets of individuals are still focusing more on energy intensive animal products rather than having a plant-based diet. This SDG also set out the goal to increase the yields of small-scale food producers, while both countries are on track to achieve this goal, France is currently moving slower than the required rate to fully achieve this objective. Something worthy of note is that in 2 of the objectives outlined under this goal, the US has failed to provide the necessary data to outline its progress. The two areas are the improvement of the minimum dietary diversity among children aged 6 to 23

[142] World Bank, "Prevalence of Moderate or Severe Food Insecurity in the Population (%) - France."
[143] SDG Index, "Sustainable Development Report 2025 - United States."
[144] SDG Index, "Sustainable Development Report 2025 - France."

months, and the closing of the yield gap, meaning to increase food production per unit area in order to reduce the expansion of agricultural land. France is on track to meet both of the aforementioned objectives.

France is a leading figure in advocating for food sovereignty, a concept that is now used often by some EU member states. In March 2025, France introduced a new orientation law on "food sovereignty and the renewal of generations in agriculture", where the concept of food sovereignty was defined through a list of 24 objectives. However, despite how positive the notion of food sovereignty is, some scholars argue that the French government has appropriated the term as it deviates from the original meaning that is understood by grassroots organisations[145].

Originally, food sovereignty was a social and agrarian concept proposed by peasant organisations in Latin America in the 1990s in response to the liberalisation of the agricultural sector due to the General Agreement on Tariffs and Trade (GATT) and other regulations put forth by the World Trade Organisation (WTO). However, due to frequent contestations on the definition of food sovereignty, the meaning behind it has evolved several times, and different sectors currently recognise different definitions[146]. Nonetheless, the most accepted articulation of the concept comes from the 2007 Nyeleni Declaration, which defines food sovereignty as "the right of peoples to healthy and culturally appropriate food produced through ecologically sound and sustainable methods, and their right to define their own food and agriculture systems"[147].

Thus, food sovereignty calls for the prioritisation of local, small-scale agricultural production and emphasises self-sufficiency, democratic control, and resilience of local food systems. However, through its alignment with the European Common Agricultural Policy (CAP), the notion of food sovereignty is inherently compromised due to the CAP advantaging large scale farms and thus exacerbating the inequalities between large corporations and local farmers[148].

Food security in both countries demonstrates the paradox that highly developed economies with sufficient food production capacities can still experience persistent hunger and nutritional inequality. Although both countries possess the economic and agricultural

[145] Colonna and Alessandrini, "What Food Sovereignty?"
[146] Colonna and Alessandrini, "What Food Sovereignty?"
[147] "Declaration of Nyéléni."
[148] Colonna and Alessandrini, "What Food Sovereignty?""

resources necessary to ensure adequate nutrition for their populations, food insecurity continues to affect millions of individuals due to structural socioeconomic inequalities. Despite France producing enough food to feed its entire population, nearly eight million individuals still experience difficulties accessing sufficient and nutritious food. Similarly, the United States maintains one of the world's most productive agricultural sectors, yet millions of households continue to depend on food assistance programmes and food pantries to meet basic nutritional needs. These realities illustrate that food insecurity in affluent countries is not primarily caused by food scarcity, but rather by unequal access to food driven by broader economic and social conditions.

Both countries have implemented state-supported measures to address food insecurity, yet their approaches differ significantly in structure and emphasis. In the United States, food assistance is largely centered around welfare-based programmes such as SNAP and WIC. These programmes have historically reduced poverty, lowered healthcare costs, and improved access to food for vulnerable populations. However, recent cost reduction measures under President Trump's 2025 fiscal reforms threaten to weaken this safety net through stricter eligibility requirements and reduced long-term assistance. France, by comparison, frames food security within a broader rights-based and systemic understanding rooted in the four pillars of food security: access, availability, quality, and stability. Furthermore, France increasingly connects food security to the concept of food sovereignty, which emphasises local agricultural resilience, democratic control over food systems, and sustainable production. While the United States primarily addresses food insecurity through targeted welfare assistance, France integrates the issue more closely into broader agricultural and social policy frameworks.

Despite these differences in policy orientation, both countries display similar trends regarding the social determinants of food security. In both France and the United States, economic vulnerability remains the primary driver of insufficient food access. Rising food prices, housing costs, and socioeconomic inequality have intensified food insecurity, particularly following the COVID-19 pandemic. In the US, food insecurity disproportionately affects Black and Latinx households, as well as residents in rural and urban areas outside suburban regions, demonstrating the extent to which racial and spatial inequalities shape access to food. Likewise, in France, lower-income households increasingly struggle to afford school lunches, fresh produce, meat, and fish, thus reflecting growing socioeconomic pressure on

improving dietary quality. In both countries, healthier food options are often more expensive and less accessible than highly processed alternatives, contributing not only to hunger but also to rising obesity and diet-related illnesses. Consequently, food insecurity in affluent countries increasingly manifests not as undernutrition alone, but also through poor nutritional quality and overconsumption of unhealthy foods.

Finally, both France and the United States have demonstrated mixed progress towards achieving SDG 2. While both countries have successfully reduced undernourishment and child hunger, they continue to face challenges regarding sustainable and nutritious diets. The US has experienced increasing rates of obesity and overnutrition, indicating regression in achieving healthier dietary outcomes, whereas France has performed comparatively better in this area. Both countries also continue to rely heavily on energy-intensive animal-based diets, thus limiting progress towards more sustainable consumption patterns. Nevertheless, France appears more aligned with several SDG indicators, particularly regarding dietary diversity and agricultural productivity targets, while the US has failed to provide sufficient data in some key areas. Overall, although both nations recognise food security as a major policy concern, France demonstrates a more integrated and sustainability-oriented approach, whereas the US remains more dependent on welfare-based interventions that are vulnerable to fluctuations in political and economic policy.

5.4 Food Waste

Another important aspect to consider is the abundance of food waste and the hindrance it is to achieving food security, especially in affluent countries. SDG 12 “Responsible Consumption and Production” aims to ensure more sustainable patterns to free economic growth from environmental degradation and waste buildup. Target 12.3 aims to halve global food waste at the retail and consumer levels and reduce food losses in every phase of the supply chain. The main focus of 12.3 regards policy, capacity and infrastructure development, and consistent monitoring.

5.4.1 Food Waste in the United States

It is commonly said that if everyone on this planet were to live like the average American, it would take five Earths to sustain the global population's level of consumption[149]. In the United States, food waste is estimated to be anywhere between 30 and 40 percent of the available food supply. The opportunity cost of this amount of food being wasted is massive, as the food could have been utilised in feeding those in need, and the energy required to produce, process, transport, and dispose of the wasted foodstuffs could also have been utilised elsewhere[150]. According to the nonprofit organisation Feeding America, more than 408 billion USD is lost annually due to food waste, with dairy products contributing the most to that sum[151]. In order to reduce the amount of food loss and waste, the USDA joined with the US Environmental Protection Agency in 2015 to set a goal to cut food waste by 50% by 2030.

Food waste in the US is caused by a variety of reasons. Matters like spoilage and equipment malfunction play a big role and occur at every stage of the supply chain[152]. Furthermore, human behaviour on the consumer level plays a large role as more than 80% of Americans discard consumable food due to confusion regarding expiration labels. This behaviour is supplemented by the fact that food in the US is in abundance and is not necessarily as costly as it is in other countries, which can lead to impulsivity in food purchases and a higher readiness to discard leftovers[153].

States like California, New York, Massachusetts, Vermont, Maine, and Rhode Island have passed laws that restrict food waste. In 2020, Vermont passed a law that bans food scrap waste entirely which led to food donations increasing by 40%. Moreover, both Maine and Rhode Island introduced legislation to reduce food waste in schools.

On a national level, the US Environmental Protection Agency (EPA) and the US Food and Drug Administration (FDA) renewed their Federal Interagency Collaboration to Reduce Food Loss and Waste in 2024. In addition, the US Agency for International Development (USAID)

[149] Center for Sustainable Systems, "U.S. Environmental Footprint Factsheet."
[150] U.S. Department of Agriculture, "Food Waste FAQs."
[151] RTS, "Food Waste in America in 2026."
[152] U.S. Department of Agriculture, "Food Waste FAQs."
[153] RTS, "Food Waste in America in 2026."

has joined in this effort as an entity with substantial federal outreach. The FDA, USDA, and EPA also announced the National Strategy for Reducing Food Loss and Waste and Recycling Organics under the Biden administration in June of 2024[154].

As previously mentioned, there has been a significant shift in priorities since the beginning of President Trump's second term in January 2025, and the aspect of reducing waste has taken on a new meaning. As President Trump attempts to boost government efficiency by cutting food assistance programs and deporting undocumented immigrants, farms all over the country are experiencing shortages of funds and labour, leading to food rotting in warehouses and on the fields[155]. Moreover, the aforementioned USAID is no longer as formidable as it once was due to the Department of Government Efficiency (DOGE)'s decision to drastically reduce the size of the agency[156].

5.4.2 Food Waste in France

Meanwhile, in France, the abundance of food availability has ensured an average daily supply of 3500 kilocalories per capita, and, on average, no more than 2200 to 2400 kilocalories per day is consumed. The remaining third of available calories is wasted during production, processing, wholesale, retail, or in the household[157]. More than 10 billion tons of food is wasted every year in France for an estimated value of 16 billion euros. Through its alignment with FAO, WFP, and IFAD, France is aiming to reduce food waste under numerous commitments, including the National Pact to Combat Food Waste, the anti-waste law for a circular economy, and the National Waste Prevention Programme[158].

France has divided its ambitions on reducing food waste into 2 goals, the first of which is to reduce food waste in retail and collective catering by 50% by 2025, and the second is to reduce food waste by 50% in all other stages by 2030 through a multi-level approach including legislation and incentives[159].

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[154] U.S. Food & Drug Administration, "Food Loss and Waste."
[155] Graddy-Lovelace |, "As US Hunger Rises, Trump Administration's 'Efficiency' Goals Cause Massive Food Waste."
[156] Helmore, "'Ignorance and Cruelty.'"
[157] Smil, *The History and Future of Food: How to Feed the World*, 1st Printing 2025.
[158] Représentation permanente de la France auprès des nations unies à Rome, "Food Loss and Waste."
[159] OECD, "A Stocktaking of Food Loss and Waste Policies: France."

In 2016, France adopted a law on combatting food waste that obligated the retail sector to refrain from destroying or discarding unsold foodstuffs but rather donate it, this law is considered to be the starting point for food waste reduction and has since been expanded further into several other decrees and laws. Despite its success, there are still some ongoing limitations regarding the specificity of the sector's obligations and its narrow scope as it does not target pre-retail steps[160].

5.4.3 Comparing the United States and France on Food Waste

Food waste represents a significant obstacle to achieving total food security in both of these affluent nations, where food abundance has encouraged overconsumption and inefficiency in handling their respective resources. Both the United States and France have recognised food waste as a major sustainability challenge within the framework of the SDGs. Nevertheless, despite sharing similar levels of food abundance, the nature and scale of waste in both countries reveal some similarities and differences. The data revealed that both the United States and France waste approximately one third of their food resources, with the United States wasting proportionally slightly more. In both cases, the excessive availability of food contributes directly to waste generation, demonstrating how food insecurity can exist paradoxically with overconsumption countries with developed economies.

Although food waste in both countries stems from inefficiencies through all levels of the supply chain, consumer behaviour plays a particularly important role in shaping national patterns of waste. In the US, waste is strongly associated with consumer culture, where food is relatively inexpensive and easily accessible, thus encouraging impulsive purchasing and disposal. Similarly, France experiences challenges with food waste at the household level, yet its public discourse around food waste has increasingly framed the issue as a matter of social and environmental responsibility. Thus, France seems to struggle less with excess consumption due to the presence of robust and evolving policies.

The most significant contrast between the two countries lies in their political and legislative responses to food waste. France has adopted a comparatively centralised and legally binding strategy, with its 2016 law prohibiting markets from destroying unsold food being its most

[160] République Francaise, "Food Waste Prevention Legislation."

notable contribution. Furthermore, France established clear national targets to reduce food waste by 50 percent by 2030. In comparison, the US has relied more heavily on decentralised measures at both federal and state levels. National agencies such as the USDA and FPA have introduced collaborative strategies aimed at reducing food waste also by 50 percent by 2030. Unlike France's unified national framework, American policies remain fragmented and highly dependent on changing political priorities as President Trump undoes previous progress and commitments.

Recent political developments further highlight the differences in policy continuity between the two countries. France's anti-food waste strategy has largely remained consistent through long-term institutional domestic and international commitments tied to environmental sustainability and circular economy principles. Conversely, food waste policy in the United States has become increasingly vulnerable to political shifts. Since the beginning of President Trump's second term in 2025, reductions in food assistance programs, USAID, and labour shortages linked to immigration policies have reportedly contributed to food losses on farms and in warehouses. Thus, while both countries recognise food waste as a critical challenge to food security, France demonstrates a more stable and preventative policy framework, whereas the United States continues to face difficulties stemming from fragmented governance and fluctuating political priorities.

5.5 Welfare Models and their impact on food insecurity governance

5.5.1 Welfare States as Structures of Food Security Governance

As detailed above, the persistence of food insecurity in economically strong democracies raises important questions regarding the relationship between welfare state structures and the governance of social vulnerability. While both France and the United States possess the economic capacity to significantly reduce severe food insecurity, their approaches toward social protection, redistribution, and welfare provision differ considerably. These differences are particularly relevant in the context of SDG 2 and the broader institutionalisation of the right to food. In the Global North, hunger is rarely the result of absolute food scarcity. Rather, it is closely connected to inequalities in access, purchasing power, labour market participation, and the extent to which welfare systems shield individuals from market

dependency. Consequently, welfare models shape not only material living conditions, but also the political and institutional logic through which hunger is governed.

The welfare regime framework developed by Esping-Andersen provides an important analytical lens for understanding these differences. Esping-Andersen distinguishes between liberal, conservative-corporatist, and social democratic welfare regimes based on the degree of decommodification, social stratification, and the relationship between the state, market, and family in welfare provision[161]. Within this framework, the United States is generally associated with the liberal welfare regime, characterised by limited state intervention, means-tested support, and a strong reliance on market mechanisms. France, by contrast, is commonly understood as belonging to the conservative-corporatist welfare tradition, which places greater emphasis on social insurance systems, state responsibility, and social solidarity[162].

These welfare structures significantly influence how food insecurity is addressed politically and institutionally. In liberal welfare systems, access to social protection remains closely tied to labour market participation and individual responsibility. Welfare provision is often residual, meaning that state intervention is primarily directed toward those considered unable to participate successfully in the market economy. By contrast, corporatist welfare systems tend to provide broader institutional protection against social risks and partially reduce dependence on market participation through more extensive welfare arrangements. As a result, welfare regimes shape the extent to which access to food is treated either as a social right connected to citizenship and dignity, or as an issue primarily mediated through market participation and emergency assistance[163].

5.5.2 The United States: Liberal Welfare Structures

In the case of the United States, the liberal welfare model is strongly characterised by market-oriented social policy and relatively low levels of decommodification. Decommodification refers to the extent to which individuals can maintain a socially acceptable standard of living independently of continuous labour market participation[164].

[161] Esping-Andersen, *The Three Worlds of Welfare Capitalism*.
[162] OECD, "Situating France in the Welfare State Literature."
[163] Berkowitz et al., "Food Insecurity and Social Policy."
[164] Bambra, "Going beyond The Three Worlds of Welfare Capitalism."

Within the American welfare system, access to healthcare, housing stability, and food security often remains highly dependent on employment and purchasing power. Although welfare programmes such as SNAP, WIC, Medicaid, and school meal programmes provide important assistance to millions of individuals, these programmes are largely targeted and means-tested rather than universal in nature[165].

This structure reflects the broader logic of the liberal welfare regime, in which the market remains the primary mechanism for the allocation of resources and welfare provision functions primarily as a safety net for the poorest segments of society. The American welfare model therefore does not fundamentally reduce dependence on market participation, but rather intervenes selectively when market outcomes are considered socially unacceptable. This dynamic becomes particularly visible during periods of economic crisis, inflation, or labour market instability, when food insecurity rises significantly among low-income households despite the existence of food assistance programmes[166].

The relatively low degree of decommodification in the United States has important implications for food insecurity governance. Since welfare provision remains limited and conditional, individuals experiencing unemployment, unstable employment, low wages, or rising living costs may rapidly become vulnerable to food insecurity. In this context, access to adequate food is strongly connected to broader socio-economic inequalities, including racial disparities, regional inequalities, housing precarity, and healthcare costs. The persistence of hunger in the United States despite its enormous agricultural output and economic wealth illustrates that food insecurity in affluent democracies is fundamentally linked to access and distribution rather than availability alone[167].

At the same time, the American welfare model also shapes the political framing of food insecurity. The United States has historically been more reluctant to institutionalise economic and social rights within binding domestic legal frameworks, especially in comparison to many European welfare states. Although the country actively participates in international food security governance and supports SDG 2 rhetorically, the right to food is not constitutionally guaranteed and remains weakly institutionalised in domestic law. Food

[165] OECD, *Food Insecurity and Food Assistance Programmes across OECD Countries*, vol. 183.
[166] Berkowitz et al., "Food Insecurity and Social Policy."
[167] Berkowitz et al., "Food Insecurity and Social Policy."

insecurity is therefore frequently framed as an issue of poverty alleviation, charity, or emergency assistance rather than as a legally enforceable social right[168].

This distinction is important because the framing of food insecurity influences the role assigned to both the state and civil society. Within the United States, charitable food assistance has become deeply institutionalised as part of the broader food security landscape. Food banks, churches, philanthropic organisations, and community initiatives play a substantial role in addressing hunger. While these actors provide essential support to vulnerable populations, as further outlined in Chapter 5.6 on the role of non-state actors, their prominence also reflects the structural limitations of the welfare state itself. The existence of extensive charitable food networks suggests that responsibility for food security governance is partially externalised from the state toward civil society and private philanthropy[169].

This dynamic can also be interpreted through the Social Origins Theory, which emphasises the historically embedded relationships between states and non-state actors in welfare provisions. Within liberal welfare regimes, civil society organisations frequently compensate for limited state intervention by filling gaps in social protection systems. Consequently, non-state actors in the United States do not merely supplement public welfare structures, but often operate as central providers of emergency food assistance. This institutional reliance on charitable actors reinforces a broader political logic in which food insecurity is treated less as a question of universal social rights and more as a matter of targeted support for vulnerable populations[170].

The American welfare model additionally reflects a strong emphasis on conditionality and means-testing. Access to welfare support is frequently dependent on income thresholds, work requirements, and administrative eligibility criteria. While these mechanisms are often justified politically through narratives surrounding efficiency, individual responsibility, and labour market participation, they may simultaneously contribute to stigma and barriers to access. The conditional nature of welfare provision can therefore shape not only material access to food, but also the social experience of receiving assistance. Food insecurity

[168] Gundersen, “The Right to Food in the United States.”
[169] Feeding America, “More than 50 Million People Turned to Hunger Relief Programs in 2023.”
[170] Sokolowski, “Explaining Civil Society Development II.”

governance within liberal welfare systems thus remains closely intertwined with broader questions of deservingness, market citizenship, and social stratification[171].

5.5.3 France: Corporatist Welfare Structures

In contrast to the United States, France represents a welfare model characterised by stronger state involvement, higher levels of redistribution, and a more institutionalised approach toward social protection. France is commonly categorised as a conservative-corporatist welfare regime, in which welfare provision is closely connected to social insurance systems, occupational status, and state-supported solidarity mechanisms[172]. Although the French welfare model is not fully universalistic, as some examples of welfare states in Scandinavia, it nevertheless provides broader social protection and a greater degree of decommodification than the liberal American model[173].

This higher degree of decommodification is particularly relevant for understanding food insecurity governance. In France, social protection mechanisms partially reduce individuals' dependence on labour market participation by providing broader access to healthcare, unemployment benefits, family support systems, housing assistance, and other welfare programmes. As a result, the welfare system functions not only as a residual safety net, but also as a broader mechanism for social integration and social stability. Access to food is therefore less directly tied to immediate market success than in the United States[174].

Additionally, the French welfare model reflects stronger traditions of republican solidarity and public responsibility regarding social welfare. Within this framework, social protection is more commonly understood as part of the broader social contract between citizens and the state. Consequently, food insecurity is more frequently framed as a collective social issue linked to inequality, exclusion, and poverty rather than solely as an issue of individual vulnerability of emergency relief. This framing aligns more closely with rights-based understandings of food security and social citizenship[175].

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[171] OECD, *Food Insecurity and Food Assistance Programmes across OECD Countries*, vol. 183.
[172] OECD, "Situating France in the Welfare State Literature."
[173] Berkowitz et al., "Food Insecurity and Social Policy."
[174] Berkowitz et al., "Food Insecurity and Social Policy."
[175] Elie, "Hunger in France's Land of Plenty."

France has also historically demonstrated stronger rhetorical engagement with international human rights frameworks relating to social rights and food access. Although the right to food itself is not comprehensively constitutionalised in French domestic law, the broader political culture surrounding welfare provision places greater emphasis on social solidarity and state responsibility. The distinction is particularly visible in the comparatively stronger integration of food insecurity into public welfare and anti-poverty strategies[176].

At the same time, the French case also demonstrates that stronger welfare systems do not automatically eliminate food insecurity altogether. Despite broader welfare provision and higher levels of social protection, food insecurity and poverty remain significant challenges in France, particularly among vulnerable groups such as migrants, undocumented populations, precarious workers, students, and low-income households. Rising living costs, inflation, and increasing housing pressures have contributed to growing demand for food assistance even within a comparatively extensive welfare system. The persistence of hunger within France consequently illustrates that welfare states may mitigate social vulnerability without fully eliminating the structural inequalities that produce food insecurity[177].

The role of civil society within the French welfare system also differs substantially from the American case. While NGOs, charities, and food aid organisations play an important role in supporting vulnerable populations, these actors more commonly operate within state-coordinated welfare structures rather than functioning as primary substitutes for absent public provision. Food aid organisations in France frequently cooperate closely with public authorities, municipalities, and social welfare institutions. Consequently, civil society operates more as a complementary extension of the welfare system rather than as an alternative governance structure replacing insufficient state intervention[178].

This distinction reflects broader differences regarding the relationship between the state, market, family, and civil society within each welfare regime. In the American liberal model, welfare governance is comparatively fragmented and decentralised, with substantial reliance on market solutions and private philanthropy. In the French corporatist model, on the other hand, the state occupies a more central coordinating role within social protection systems.

[176] Elie, "Hunger in France's Land of Plenty."
[177] OECD, *Food Insecurity and Food Assistance Programmes across OECD Countries*, vol. 183.
[178] Chambres régionales & territoriales des compltes, "The Fédération Française Des Banques Alimentaires."

These differing institutional arrangements shape not only policy outcomes, but also the political meaning of food insecurity itself.

5.5.4 Comparative Analysis of French and American Welfare Structures

The comparison between France and the United States highlights how welfare regimes do not merely determine the scale of social protection, but fundamentally structure the institutional logic through which food insecurity is governed. Rather than reflecting differences in economic capacity, the divergence between both cases lies in the degree to which access to food is mediated through market participation, state intervention, and the institutionalisation of social rights. In this sense, welfare regimes shape both the material distribution of support and the political meaning attached to food insecurity within each national context.

A central distinction concerns the role of conditionality versus social citizenship in welfare provision. In the United States, access to welfare support is predominantly structured through means-testing and eligibility criteria tied to income, employment status, or household composition. This conditional architecture reflects a broader liberal welfare logic in which social protection is designed as a residual mechanism, activated primarily when market outcomes fail to secure minimum living standards. While such targeting is often justified through efficiency and labour market incentives, it also produces a fragmented system in which access to support depends on administrative navigation and continuous proof of need.

In France, although welfare provision is not fully universal in the Scandinavian sense, social protection is more strongly embedded in principles of collective solidarity and social insurance. Access to welfare is less explicitly framed as exceptional assistance and more as part of a broader system of social rights linked to citizenship and occupational status. Drawing on T.H. Marshall's notion of social citizenship[179], welfare provision in this context can be understood as part of the institutional infrastructure that enables social participation. Consequently, food insecurity is more easily interpreted as a failure of social integration rather than solely as individual deprivation requiring emergency relief.

[179] Marshall and Bottomore, *Citizenship and Social Class*.

These differences in welfare architecture translate directly into distinct governance logics of food insecurity. In the United States, food insecurity governance is highly dispersed across policy domains and institutional actors. While public programmes such as SNAP or school meal provisions play a critical role, they operate alongside a substantial ecosystem of charitable food assistance. This reflects a broader institutional pattern in which civil society and philanthropic organisations are not merely complementary actors, but essential components of the welfare system itself. Food insecurity governance therefore becomes partially externalised from the state, producing a hybrid system in which public provision and private charity are functionally intertwined.

In France, by contrast, civil society actors operate more clearly within a state-centred welfare architecture. Food aid organisations and NGOs play an important role in addressing material need, yet they are more often embedded in public coordination structures and welfare partnerships rather than substituting for absent state provision. The state retains a stronger coordinating role in defining eligibility, structuring access, and integrating food insecurity responses into broader social policy frameworks. As a result, civil society engagement is better understood as an extension of welfare governance rather than its structural substitute.

A second key dimension of comparison concerns the degree of decommodification, understood as the extent to which individuals are protected from complete dependence on labour markets for basic welfare. In France, relatively higher levels of decommodification are achieved through a combination of unemployment insurance, housing support, healthcare provision, and family benefits. These mechanisms do not eliminate poverty or food insecurity, but they reduce the immediacy with which labour market shocks translate into deprivation. In the United States, lower levels of decommodification mean that income volatility, precarious employment, and rising living costs are more directly transmitted into household food insecurity, even when targeted assistance programmes exist.

This divergence has important implications for how food insecurity emerges and is experienced. In the United States, food insecurity is more tightly coupled to labour market dynamics, healthcare costs, and housing affordability, producing a system in which vulnerability can escalate rapidly during periods of economic instability. In France, welfare institutions provide a stronger buffering capacity, although not sufficient to fully prevent the emergence of food insecurity among structurally marginalised groups. In both cases,

however, food insecurity remains concentrated among populations facing intersecting forms of disadvantage, including precarious employment, migration status, racialisation, or housing insecurity.

Importantly, the comparison also demonstrates that higher levels of welfare protection do not automatically eliminate food insecurity. Both France and the United States continue to experience persistent forms of hunger and nutritional deprivation despite high levels of aggregate wealth and food availability. This reinforces the argument that food insecurity in affluent democracies is not primarily a question of supply, but of distribution, institutional access, and socio-economic inequality embedded within broader capitalist structures. Welfare regimes may mitigate these dynamics to varying degrees, but they do not fully resolve the structural conditions that produce vulnerability.

A further implication concerns the political framing of food insecurity. In the United States, food insecurity is more frequently framed through narratives of poverty alleviation, temporary hardship, and charitable intervention. This framing aligns with a welfare logic in which assistance is conditional, targeted, and often associated with stigma or administrative burden. In France, food insecurity is more commonly situated within broader discourses of social exclusion, inequality, and solidarity, reflecting a stronger association between welfare provision and collective responsibility. These framing differences are not merely rhetorical; they shape institutional priorities, policy design, and the perceived legitimacy of state intervention in guaranteeing access to food.

These divergent framings also influence the domestic translation of SDG 2. While both countries formally endorse global commitments to ending hunger, the institutional pathways through which SDG 2 is operationalised differ substantially. In France, stronger integration between welfare institutions and anti-poverty strategies allows food insecurity to be more readily embedded within coordinated social policy frameworks. In the United States, fragmented governance structures and reliance on targeted programmes and charitable networks lead to a more dispersed implementation landscape, where objectives are distributed across multiple, partially disconnected institutional domains.

Taken together, these differences illustrate that welfare regimes structure not only the scale and form of social protection, but also the governance architecture and normative meaning of

food insecurity. The United States reflects a model in which market dependence is only partially offset by targeted state intervention and extensive civil society provision, producing a decentralised and conditional governance system. France, by contrast, reflects a model in which the state plays a more central coordinating role, and where social protection is more strongly embedded in principles of solidarity and social rights.

Ultimately, the comparison underscores that the persistence of food insecurity in affluent democracies cannot be understood independently of welfare regime structures. While economic capacity and food availability are necessary conditions for eliminating hunger, they are insufficient in the absence of institutional arrangements that guarantee equitable access to resources. Welfare regimes therefore determine not only who receives support, but also whether access to food is conceptualised as a matter of market outcome, charitable relief, or enforceable social citizenship. This institutional framing is central to understanding why food insecurity persists across different welfare models, and why its governance takes structurally distinct forms in France and the United States.

5.6 The Role of Non-State Actors

Even in the Global North, governments often cannot fully guarantee universal food access. Gaps in coverage, bureaucratic barriers, and crisis shocks mean that civil society organisations (CSOs) frequently step in to fill the void. Charities, NGOs, food banks, and social enterprises bring flexibility, local knowledge, and resources that complement the state's efforts. Non-state actors mobilise volunteers and private donations, redistribute surplus food, and advocate for vulnerable groups. In doing so, they become key actors in implementing the SDGs on the ground. For example, Onicini notes that despite expanded welfare systems in the 20th century, food insecurity continues to persist globally and charitable food provision has become an important safety net for the most vulnerable demographics[180]. In practice, this means CSOs directly influence food access and the policy regarding it through their distribution programs and advocacy.

Non-state actors also help diffuse and reinforce rights-based norms. Transnational networks of NGOs use information sharing and campaigning to pressure governments. Risse and

[180] Oncini, "Beyond the Breadline."

Sikkink's spiral model suggests that transnational advocacy networks can gradually pressure states that go against international human rights norms into accepting and adopting them. In the food security sector, global coalitions such as the Right to Food network lobby for the recognition of a human right to food and regularly assist domestic NGOs. By framing hunger as a rights issue, these networks push states to align their policies with the right to food. For instance, both French and American NGOs cite UN Special Rapporteurs and treaties in pressuring their governments. Therefore, NGOs act both as service providers and as norm-socialisers, and they translate SDG 2 and human rights norms into local campaigns and legal proposals while they do so.

From a welfare-regime perspective, the strength of the state safety net shapes how reliant a country becomes on non-state actors. In liberal regimes with minimal social provisions, a large NGO sector often emerges as a substitute for public aid. In more corporatist or social-democratic regimes, NGOs tend to operate in partnership with the state, complementing official programmes[181]. The social origins theory similarly predicts that where public welfare is lacking, the non-state sector is present to fill gaps. This dynamic is evident in food aid: in countries with generous welfare, non-state actors are generally fewer and more integrated with the government. Conversely, charities and food banks expand to manage existing shortfalls in more market-oriented economic systems.

However, it can be argued that reliance on charity and other non-state services can weaken state accountability, as evidenced by food banks emerging precisely when governments choose to cut social spending[182]. Thus, an extensive network of non-state actors may unintentionally legitimise a "reduced" welfare state. Charitable systems also risk depoliticising hunger by framing food as a gift rather than a right, which in turn leads to a loss in leverage to demand policy change. Regardless, non-state actors can also challenge governments through monitoring, documentation, and advocacy.

5.6.1 The United States

In the United States, non-state actors dominate much of the practical delivery of food aid. The US has a vast "charitable food system" built around organisations such as Feeding

[181] Esping-Andersen, *The Three Worlds of Welfare Capitalism*.
[182] Riches, "Food Banks and Food Security."

America that has a network of hundreds of food banks, soup kitchens, and faith-based distributors. It is estimated that over 60,000 food assistance entities serve more than 46 million Americans annually. These organisations operate together with federal programmes such as SNAP and WIC, but often take on beneficiaries that have been left behind by other systems for example during crises or for individuals that did not meet the qualification criteria by a narrow margin.

The heavy involvement of non-state actors reflects the country's liberal welfare regime. The state expects family, community, and private entities to handle many social needs. Food banks in the US currently exist to "supplement the social welfare system", and hence are filling in gaps in income support that are left by the government. Moreover, food banks have now formed a relationship to corporate supply chains, as companies offload unwanted food to charities, making food banks part of a "corporate welfare" model and placing a higher burden on non-state actors to provide hunger relief, rather than push for stronger state intervention[183].

Moreover, non-state actors in the US are heavily involved in advocacy. National anti-hunger groups such as the Food Research and Action Center lobby Congress to protect programmes like SNAP and to expand food access[184]. They have occasionally pushed for the recognition of the right to food and subsequent policy changes. The spiral model helps explain this as non-state actors form domestic networks that interact with international bodies to pressure the US government despite frequent resistance. However, their success is limited by political culture as the government's emphasis on individual responsibility and limited government means that most efforts on combatting hunger remain framed as a charitable act rather than the enforcement of a right.

The result is a paradox. The US government publicly partners with non-state actors but it also effectively offloads responsibility onto them. Non-state actors have become institutionalised as a key part of the government's safety net. Meanwhile, community-based food justice and food sovereignty movements have grown to critique the existing system and demand structural changes to wages, land use, and racial disparities. These movements stress that hunger in the US is not just a failure in policymaking but a product of economic injustice[185].

[183] Stein and Brinkley, "Food-Bank Donors Motivated by Social Responsibility and Financial Benefits."
[184] FRAC, "Working to End Hunger in America."
[185] Stein and Brinkley, "Food-Bank Donors Motivated by Social Responsibility and Financial Benefits."

In short, non-state actors in the US act as a substitute for government aid as they mitigate hunger, but they do so in a fragmented, non-rights-based way that shifts the obligation to the private sector rather than the state.

5.6.2 France

France's landscape of non-state actors in food security is remarkably different. NGOs and charities in France operate within a robust welfare framework and in close cooperation with government and EU programs. Major French organisations such as the food banks (Banques Alimentaires), Restos du Cœur, Secours Catholique, Secours Populaire, and the Red Cross are well-funded networks that distribute millions of meals annually. For example, recent data shows that the Fédération Française des Banques Alimentaires (FFBA) comprises 79 food banks serving a network of over 6,000 local charities, and in 2023 it helped deliver 224 million meals to 2.4 million people. This achievement has been enabled by significant public subsidies as the French government, along with the EU, quintupled the FFBA's budget to 47 million euros from 2019 to 2023[186]. Moreover, EU funds are consistently being channeled to NGOs such as the Fund for the European Aid to the Most Depriced (FEAD), which provided over 600 million euros to France between 2014 and 2020 and supported about a third of national food aid[187].

In practice, French non-state actors mostly complement the existing welfare system. They are considered integrated parts of a multi-level system. For instance, the aforementioned 2016 anti-waste law heavily relies on NGO distribution networks such as Banques Alimentaires[188]. French food charities also frequently partner with local and national authorities and receive payments for services like delivering meals to schools.

Politically and culturally, France has a strong right-based orientation. CSOs regard food aid through the lens of human dignity and social justice. Restos du Cœur, for example, reports that it distributed about 170 million meals in 2022–2023, and its leaders regularly call on the government to address poverty's structural causes. Moreover, when food prices spiked in 2023, the organisation appealed directly to Macron's government for the implementation of

[186] Fédération Française des Banques Alimentaires, *Press Release*.
[187] European Commission, "EU Solidarity at the Heart of France's Fight against Food Insecurity | European Social Fund Plus."
[188] Chrisafis, "French Law Forbids Food Waste by Supermarkets."

relief measures, and the government responded with an emergency 15 million euro grant[189]. However, the CNCDH has explicitly criticised the French reliance on a charitable or assistance-based model of food access and has advocated for improvements regarding the respect of human dignity and sustainable access to adequate food[190].

Therefore, France's model reflects its conservative/corporatist welfare traits. The state retains primary responsibility, but non-profits are co-opted into a network of social partners. NGOs here rarely act as a substitute for public assistance, rather they form an integral part of the government's plan and process. For example, the EU ESF+ highlights that France's four main food aid NGOs work together within EU-backed programmes[191]. This formalised partnership means non-state actors help implement social policy rather than letting the state abdicate its responsibility. At the same time, non-state actors do use advocacy by lobbying the EU and French government to further strengthen welfare measures by increasing income schemes and expanding food provision programmes. The spiral model further proves this as French non-state actors readily draw on EU social rights norms to further their cause. For instance, a 2024 Restos event featured the French Prime Minister, underscoring that NGOs are aligned with, not isolated from, official policy[192].

Nonetheless, there are criticisms of the existing relationship between non-state actors and the French state. Similarly to the US, growing reliance on charities can indicate shortcomings in social protection. The rise in beneficiaries at Restos du Cœur and Banques Alimentaires as it reached an increase of 10% more people in recent years is further proof that public assistance alone is not fully solving food insecurity[193]. If these charities continue to expand, policymakers might end up reducing public welfare under the assumption that CSOs are perfectly capable of filling this gap on their own. However, currently, French non-state actors generally strengthen the existing human rights framework as they publicly emphasise the state's obligations. This further reflects a national culture where rights like welfare, health, and education are seen as collective entitlements. In short, French non-state actors

[189] Reuters, "French Food Bank Says Government Must Do More to Tackle Inflation."
[190] Commission nationale consultative des droits de l'homme, République Francaise, "Avis pour le droit à une alimentation saine, durable et choisie."
[191] European Commission, "EU Solidarity at the Heart of France's Fight against Food Insecurity | European Social Fund Plus."
[192] European Commission, "EU Solidarity at the Heart of France's Fight against Food Insecurity | European Social Fund Plus."
[193] Reuters, "French Food Bank Says Government Must Do More to Tackle Inflation."

complement the state as they manage distribution and advocate for more robust social policies but do not replace government assistance.

5.6.3 Comparative Analysis

Comparing the two cases highlights how welfare structures shape the role that non-state actors play. The United States and France both have highly active civil societies, but their implementation regarding food security operates quite differently. In line with being a liberal welfare regime, charitable food organisations fill critical gaps left by the government in the US. The large number of US food banks and other food-related entities reflect the country's heavy reliance on them. Policy wise, this institutionalisation of charity has coincided with a reluctance to recognise food as a legal right, non-state actors in the US tend to operate under the scope of philanthropy rather than a rights-based framework. Thus, they act as substitutes for government aid, making the notion that the government is to be held accountable for ensuring food availability and accessibility weaker and weaker.

On the other hand, in France's corporatist welfare regime, non-state actors are tightly interconnected with the state. Strong social protections mean that NGOs are fewer, more targeted, and serve as partners of the government. French NGOs operate within a framework of social rights and EU support, and they often lobby to enhance those rights. In practice, this means that French civil society exists to complement rather than replace public welfare. Even though France has growing demand for emergency aid, its CSOs do not absolve the state of responsibility as the state maintains significant obligations for social welfare and provides direct subsidies to these organisations[194].

The key differences between the two countries include that stronger welfare provision in France has generally meant lower dependence on charities than its American counterpart. French non-state actors operate under more regulated and rights-based conditions, while in the US they function in a more market driven and volunteer-based system. Regarding accountability, US non-state actors arguably diffuse state responsibility and thus make food aid seem voluntary, whereas French charities reinforce a model of social solidarity even as they assist people in need. Regarding SDG 2 and the right to food, the French approach is

[194] Fédération Française des Banques Alimentaires, *Press Release*.

closer to the ideal of state-guaranteed food security while the US system seems to be more scattered, individualised, and charity-driven.

5.7 Multi-Level Governance

5.7.1 SDG 2 as a Multi-Level Governance Challenge

The governance of food insecurity within affluent democracies increasingly constitutes a multi-level governance challenge rather than solely a question of agricultural production or welfare expenditure. While SDG 2 formally aims to "end hunger, achieve food security and improved nutrition and promote sustainable agriculture," its implementation depends on coordination across multiple institutional and territorial levels, including international organisations, national governments, subnational authorities, and civil society actors. In practice, the implementation of SDG 2 therefore extends far beyond food policy itself and intersects with welfare governance, labour market regulation, healthcare systems, housing policy, territorial inequalities, and social protection mechanisms on multiple policy levels[195].

Hence, the concept of multi-level governance is particularly relevant because food insecurity governance involves overlapping competences between international organisations, national ministries, regional authorities, municipalities, and non-state actors. Responsibilities concerning food assistance, social welfare, agricultural regulation, school meals, healthcare access, and poverty reduction are frequently distributed across multiple institutions with differing competences and priorities. This creates potential governance fragmentation, implementation inconsistencies, and coordination challenges, particularly in federal or decentralised political systems. At the same time, governance structures may also facilitate institutional coordination and policy coherence where administrative systems are more centralised or strongly integrated[196].

The governance dimension of SDG 2 is further reinforced by the nature of the Sustainable Development Goals themselves. Unlike legally binding international treaties, the SDGs primarily operate through soft governance mechanisms, including voluntary reporting, peer

[195] United Nations Department of Economic and Social Affairs, "Goal 2 | Department of Economic and Social Affairs."
[196] OECD, "Multi-Level Governance."

review, norm diffusion, and political commitment. Their implementation therefore depends heavily on domestic institutionalisation processes and governance capacity. The absence of binding enforcement mechanisms means that national governments retain considerable discretion regarding how SDG objectives are interpreted, prioritised, and operationalised within domestic governance systems. As a result, implementation pathways vary significantly between countries depending on welfare traditions, political priorities, administrative structures, and state-society relations[197] [198].

This governance-oriented understanding of SDG implementation strongly aligns with the theoretical framework of this thesis. From the perspective of Risse and Sikkink's Spiral Model[199], international norms become institutionalised domestically through processes of socialisation, political pressure, reporting obligations, and engagement with transnational advocacy networks. However, the degree of domestic institutionalisation depends heavily on national governance structures and political willingness to internalise international norms. Consequently, differing governance arrangements between France and the United States shape the extent to which international norms regarding the right to food and SDG 2 become embedded within domestic policy systems.

Accordingly, this subchapter examines how governance structures, institutional competences, and coordination mechanisms shape the implementation of SDG 2 and the governance of food insecurity in France and the United States. Particular attention is paid to governance fragmentation versus coordination, federalism versus centralisation, and the role of international, national, and subnational actors in institutionalising food-related human rights norms within domestic governance systems.

5.7.2 International Governance and Norm Diffusion

The governance of SDG 2 is embedded within a broader international governance architecture composed of international organisations, multilateral agreements, reporting frameworks, and transnational advocacy networks. Unlike legally binding international

[197] United Nations Department of Economic and Social Affairs, "Transforming Our World: The 2030 Agenda for Sustainable Development | Department of Economic and Social Affairs."
[198] United Nations High Level Political Forum on Sustainable Development, "Countries Who Have Presented Their Voluntary National Reviews."
[199] Risse and Sikkink, *The Power of Human Rights*.

treaties with strong enforcement mechanisms, the Sustainable Development Goals primarily function through soft governance mechanisms based on voluntary commitment, political coordination, pressure from other nations, and normative diffusion. As a result, the implementation of SDG 2 depends heavily on the willingness and institutional capacity of states to incorporate international norms into domestic governance systems. The SDGs therefore represent a governance framework that relies less on legal coercion and more on political legitimacy, international reputation, and institutional socialisation[200] [201].

Within this governance architecture, the United Nations plays a central agenda-setting role by coordinating the broader SDG framework and facilitating international monitoring processes. The HLPF serves as the primary international platform for reviewing progress regarding SDG implementation. States are encouraged to submit Voluntary National Reviews (VNRs)[202], which outline national progress, governance strategies, institutional arrangements, and implementation challenges. However, because these reviews are voluntary and non-binding, they function primarily as instruments of soft governance and international peer review rather than formal accountability mechanisms. Consequently, implementation outcomes vary substantially depending on domestic political priorities, administrative capacity, and governance structures.

The Food and Agriculture Organisation additionally plays a significant role in shaping international governance regarding food security and the right to food. Through policy frameworks, governance guidelines, technical assistance, and monitoring mechanisms, the FAO contributes to the diffusion of international norms surrounding food security governance and social rights. Particularly relevant are the FAO's Right to Food Guidelines, which encourage states to integrate rights-based approaches into national governance systems and social policies[203]. These guidelines frame food security not merely as a matter of agricultural productivity, but as an issue connected to human dignity, social protection, and institutional accountability.

[200] United Nations High Level Political Forum on Sustainable Development, "High-Level Political Forum."
[201] United Nations Department of Economic and Social Affairs, "Transforming Our World: The 2030 Agenda for Sustainable Development | Department of Economic and Social Affairs."
[202] United Nations High Level Political Forum on Sustainable Development, "Countries Who Have Presented Their Voluntary National Reviews."
[203] Food and Agriculture Organization of the United Nations, "Right to Food."

International governance surrounding food security is also shaped by broader human rights institutions and legal frameworks. The Office of the United Nations High Commissioner for Human Rights (OHCHR)[204], alongside monitoring structures connected to the International Covenant on Economic, Social and Cultural Rights (ICESCR)[205], and the Special Rapporteur on the Right to Food contribute to the institutionalisation of the right to food within international human rights discourse. Although the right to adequate food is recognised within international human rights law, the extent to which these norms become domestically institutionalised varies significantly between states. In practice, international human rights governance surrounding food insecurity often relies on reporting obligations, monitoring procedures, and normative pressure rather than direct legal enforcement.

The CFS further reflects the increasingly multi-actor nature of international food governance. It operates as a multi-stakeholder governance platform involving states, UN agencies, civil society organisations, research institutions, and international organisations[206]. Its governance structure reflects broader trends toward collaborative and networked governance within international development frameworks. Most importantly, the CFS also illustrates how international governance increasingly incorporates non-state actors into global policy coordination and norm diffusion processes relating to food security and social protection.

From the perspective of the theoretical framework employed in this thesis, it becomes evident why the governance framework surrounding SDG 2 must also be analysed through the lens of multi-level governance. While international organisations provide the norms, reporting mechanisms, and governance frameworks, the actual implementation of food-related rights and anti-hunger policies remains a clear mandate of the nation state. According to Risse and Sikkink's spiral model the international SDG governance mechanism should gradually become internalised within domestic governance systems through processes of socialisation, international pressure, reporting obligations, advocacy, and political adaptation. However, how well this holds must be analysed on the subsequent levels within the United States and France. Most importantly, because the institutionalisation of the international SDG 2 governance framework depends heavily on how domestic governance systems respond to this international normative pressure. States with stronger traditions of multilateral engagement

[204] United Nations Human Rights Office of the High Commissioner, "Special Rapporteur on the Right to Food."
[205] OHCHR, "International Covenant on Economic, Social and Cultural Rights."
[206] Committee on World Food Security, "Committee on World Food Security | FAO."

and social rights recognition, such as France, may be more likely to integrate SDG objectives into governance structures and institutional planning processes. Conversely, states with stronger emphasis on national sovereignty, market governance, or limited welfare provisions, such as the United States, may adopt more selective approaches toward norm institutionalisation.

5.7.3 The United States: Fragmented Federal Governance

The governance of food insecurity in the United States is characterised by a highly decentralised federal system in which competences relevant to SDG 2 implementation are distributed across multiple administrative levels, including federal, state, and local authorities. While the federal government sets broad policy frameworks for food assistance and social protection, implementation is significantly shaped by subnational discretion, resulting in substantial variation in access, eligibility rules, and administrative capacity across states and counties. This multi-level structure even within the United States produces a governance landscape in which food insecurity is not primarily the result of insufficient policy instruments, but rather of fragmented institutional responsibilities and uneven territorial implementation.

A central institution in the governance of food insecurity is the USDA, which administers key food assistance programmes such as SNAP[207]. Although SNAP is federally funded, its administration is delegated to state-level agencies, which introduces variation in implementation practices, administrative efficiency, and accessibility. This shared governance structure reflects a broader pattern of "cooperative federalism," where federal objectives are operationalised through state-level execution. However, this arrangement also generates unevenness in policy outcomes, as differences in bureaucratic capacity and political priorities at the state level directly affect the effectiveness of food assistance delivery.

Beyond the USDA, additional federal institutions contribute to the governance of food insecurity, most notably the Department of Health and Human Services (HHS), which oversees broader welfare and health-related programmes that indirectly affect food security outcomes. Legislative authority within Congress further shapes the institutional environment,

[207] United States Department of Agriculture, "Supplemental Nutrition Assistance Program (SNAP) | Food and Nutrition Service."snap

particularly through budgetary decisions and welfare policy reforms. However, increasing political polarisation has contributed to contested policy-making processes, affecting the stability and expansion of social protection measures[208]. As a result, the governance of food insecurity is not only institutionally fragmented but also politically constrained, which limits the coherence and long-term predictability of national strategies relevant to SDG 2 implementation

Within this fragmented governance architecture, the US approach to the institutionalisation of SDG 2 remains largely selective and decentralised, with limited embedding of SDG targets into domestic policy structures. This weak institutionalisation reflects a broader governance orientation in which international frameworks are interpreted primarily through domestic policy priorities rather than systematically integrated into national planning processes. Consequently, SDG 2 functions more as an external reference framework than as an internally governing policy objective within the US administrative system[209].

A further defining feature of the US governance system is the high degree of variation across states and localities, which significantly shapes the territorial distribution of food insecurity. States differ in their welfare policies, administrative capacities, and eligibility criteria for social assistance programmes, leading to unequal access to food-related support mechanisms. At the local level, municipalities and counties play an increasingly important role in addressing food insecurity, often compensating for gaps in federal and state provision. In many cases, local innovation in food policy emerges in response to structural limitations within higher levels of governance, reinforcing spatial inequalities in welfare provision and implementation outcomes.

This fragmented governance structure is particularly evident in rural and agriculturally significant regions, where the paradox of high food production coexists with persistent food insecurity[210]. This contradiction becomes particularly visible in the case of Iowa, which illustrates how food insecurity can persist even within one of the most agriculturally productive regions of the United States. Iowa recorded a historic agricultural output in 2025,

[208] Welsh, *The Last U.S. Hunger Data: What We Lose with the Termination of the USDA's Household Food Security in the United States Report*.
[209] Sustainable Development Solutions Network, "The US Is Against the World on Sustainable Development."
[210] Iowa Health & Human Services, "State Agencies to Enhance Existing Childhood Nutrition Programs, Decline Summer EBT Participation."

producing approximately 2.77 billion bushels of corn and 596 million bushels of soybeans, representing some of the highest yields nationally[211]. Despite this abundance in food production, food insecurity remained widespread across the state, highlighting the structural distinction between food production and food access within liberal market-based welfare systems.

According to Feeding America estimates for 2025, approximately 385,130 Iowans, representing around 12% of the state population, experienced food insecurity, including more than 120,000 children. Furthermore, all 99 counties in Iowa reportedly experienced increases in hunger rates, while several rural counties such as Appanoose and Wapello recorded child food insecurity rates exceeding 20%[212] [213]. These developments demonstrate that high levels of agricultural production do not automatically translate into equitable food access, particularly where access remains mediated through labour market participation, income stability, and welfare eligibility.

The Iowa case also reveals the territorial dimensions of fragmented governance within the US federal system. Rural regions experiencing agricultural decline, employment losses, and demographic change often possess weaker institutional infrastructures and more limited access to social services than urban centres such as Des Moines. Sparse public infrastructure, transportation barriers, and long travel distances create additional obstacles for households attempting to access welfare services or food assistance programmes[214]. Consequently, the governance of food insecurity becomes heavily shaped by territorial inequalities in administrative capacity and local service provision.

At the same time, many food insecure households in Iowa fall outside traditional assumptions regarding welfare dependency. Working families, retirees, and agricultural labourers frequently experience difficulties accessing support despite persistent economic vulnerability. Although approximately 132,000 Iowa households currently receive SNAP benefits, declining SNAP caseloads since the COVID-19 pandemic suggest that administrative hurdles, eligibility restrictions, work requirements, and social stigma may limit programme

[211] Brisbine, “Iowa Farmers Set Records for Corn and Soybean Production.”
[212] Hacker, “Feeding America Study: Food Insecurity Has Increased in Every Iowa County.”
[213] United Health Foundation, “Food Insecurity in Iowa.”
[214] Hacker, “Feeding America Study: Food Insecurity Has Increased in Every Iowa County.”

accessibility even where need persists[215]. This reflects broader characteristics of the US welfare model, in which food assistance remains strongly conditional and closely tied to bureaucratic eligibility structures.

The fragmented nature of governance is further reflected in the reliance on local actors and decentralised coordination mechanisms to address food insecurity. Food policy councils, community action agencies, food banks, and school meal programmes increasingly compensate for gaps in federal and state provision, particularly in underserved rural regions. State agencies reported that local organisations distributed millions of meals through programmes such as SUN Meals and summer nutrition initiatives, illustrating both local innovation and the growing dependence on non-state actors within food insecurity governance[216]. However, these localised responses also reveal the limits of fragmented governance systems, as implementation capacity often depends heavily on local funding availability and organisational resources.

Finally, the Iowa case demonstrates the tensions that frequently emerge between federal governance objectives and state-level political priorities. In 2023, the administration of Governor Kim Reynolds declined participation in the federal Summer EBT programme, instead favouring state-administered nutrition initiatives. By 2025, however, Iowa negotiated participation through a modified "Healthy SNAP" arrangement aligned with state nutrition priorities after receiving a USDA waiver[217]. This policy evolution illustrates the contested nature of cooperative federalism within the United States, where federal anti-hunger initiatives are frequently reshaped through state-level political negotiation and administrative discretion. From a multi-level governance perspective, Iowa therefore illustrates how fragmented competences and political heterogeneity can complicate the institutionalisation of food-related social rights and produce uneven implementation outcomes despite substantial national food abundance.

Overall, the United States illustrates how a decentralised federal governance system produces uneven implementation of SDG 2 through fragmented institutional responsibilities, territorial

[215]Iowa Health & Human Services, "State Agencies to Enhance Existing Childhood Nutrition Programs, Decline Summer EBT Participation."
[216] Iowa Health & Human Services, "State Agencies to Enhance Existing Childhood Nutrition Programs, Decline Summer EBT Participation."
[217] Official State of Iowa Website - Governor Kim Reynolds, "State of Iowa Receives USDA Approval to Align Healthy SNAP, SUN Bucks Summer Food Program in 2026."

variation, and limited national coordination of food security policies. While the system allows for local flexibility and policy innovation, it simultaneously generates significant disparities in access to social protection and food assistance across regions. From a multi-level governance perspective, these dynamics highlight how institutional fragmentation and political heterogeneity shape the domestic translation of international norms related to the right to food and sustainable development objectives.

5.7.4 France: Centralised Coordination within the European Union

In contrast to the fragmented federal governance structure of the United States, the governance of food insecurity in France is characterised by a comparatively centralised administrative system combined with strong integration into European Union governance structures. The French governance model reflects a more coordinated approach toward welfare provision and SDG implementation, in which national ministries, territorial administrations, local authorities, and supranational European institutions operate within a comparatively integrated institutional framework. Consequently, the governance of food insecurity in France is shaped not only by domestic welfare structures, but also by broader European governance mechanisms relating to agriculture, social protection, and sustainable development.

France formally integrated the Sustainable Development Goals into national governance structures shortly after the adoption of the 2030 Agenda and presented a Voluntary National Review at the United Nations in 2016, signalling an early institutional commitment to SDG implementation. Unlike the United States, where SDG governance remains comparatively decentralised and weakly institutionalised, France embedded the SDGs within national planning and administrative coordination processes through government roadmaps and interministerial structures[218]. This stronger institutionalisation reflects broader traditions of state coordination and multilateral engagement within French public administration.

At the national level, governance responsibilities relevant to food insecurity are coordinated primarily through central ministries and administrative bodies operating under the authority of the French state. Welfare provision, agricultural policy, school meal systems, anti-poverty

[218] Gouvernement Francais, “The 2030 Agenda for Sustainable Development in France.”

initiatives, and public health strategies are integrated through comparatively coherent national policy frameworks. At the same time, implementation responsibilities are distributed territorially through regions, départements, municipalities, and the préfectoral system, which functions as a mechanism of state coordination between central government and local administrations[219]. This governance arrangement enables stronger vertical coordination than in the United States, while still allowing local authorities to adapt implementation to territorial conditions.

The governance of food insecurity in France is further shaped by the additional supranational governance layer provided by the European Union. French food and welfare policies operate within broader EU frameworks relating to agriculture, rural development, social cohesion, and anti-poverty governance. Particularly important is the Common Agricultural Policy, which structures agricultural subsidies, rural development funding, and food production governance across EU member states[220]. Through the CAP and related European social funds, the EU provides both financial resources and regulatory frameworks that influence domestic approaches toward food security and territorial development. As one of the leading agricultural producers in the EU, France is also the largest recipient of CAP funds, both from the European Agricultural Guarantee Fund and the European Agricultural Fund for Rural Development.. The funds are used primarily as direct payments to farmers (72%), followed by funds for rural development (22%) as well as a small share going to market intervention (6%). While the market intervention is only a small part of the funds received from the CAP funds, it is noteworthy, that the 6% in France are far higher than the EU average, where in most member states less than 1% is used for direct market intervention[221]. These funds provide a good example of France's multi-level governance structure in the food system, using funds from the supranational EU governance level, which are also tied to strict requirements and guidance for their use, distributing them via the centralised national level of French governance and implementing them within the municipal or rural level. This shows how food security governance in France is embedded within a complex multi-level governance structure linking European, national, regional, and local institutions.

[219] Gouvernement Francais, "The 2030 Agenda for Sustainable Development in France."
[220] European Commission, "The Common Agricultural Policy."
[221] European Parliament, "EU Agriculture Policy in Numbers (Infographics)."

This European governance dimension also functions as a mechanism of norm diffusion and institutional coordination. Through EU directives, funding structures, sustainability frameworks, and social inclusion strategies, European institutions encourage member states to align domestic governance practices with broader social and developmental objectives. Unlike the voluntary and comparatively weak institutionalisation of SDG 2 within the United States, France's membership within the European Union creates additional governance pressures toward policy coordination and integration. The European Commission has issued several communications on the topic of food security and implemented governance, implementation, and monitoring systems in light of the increasing crisis that have affected food security, such as the Russian invasion of Ukraine or the COVID-19 pandemic. This includes, for instance, the European Food Security Crisis Preparedness and Response Mechanisms that helps monitor the development of food security not only in France, but in all EU member states[222].

In this regard, the EU acts not only as a funding structure, but also as a governance actor shaping domestic institutionalisation processes relating to social protection, food governance, and sustainable development objectives.

The interaction between national and local governance structures is particularly visible through France's Territorial Food Projects (Projets Alimentaires Territoriaux, PATs), which seek to integrate agricultural production, local markets, environmental sustainability, and food accessibility within territorially coordinated frameworks. PATs involve collaboration between local governments, agricultural actors, civil society organisations, and state institutions in order to coordinate local food systems more coherently[223]. Importantly, these initiatives combine local implementation with national and European policy frameworks, including CAP-related funding mechanisms[224]. This reflects a governance logic characterised by coordination and institutional integration rather than the more ad-hoc localism often observed within the United States.

[222]European Commission, "Ensuring Global Food Supply and Food Security - Agriculture and Rural Development."
[223] Ministère de l'agriculture de l'agro-alimentaire et de la souveraineté alimentaire, "Tout savoir sur les projets alimentaires territoriaux (PAT)."
[224] Gouvernement Francais, "The 2030 Agenda for Sustainable Development in France."

This stronger rights-oriented governance framing is also reflected in the relationship between the French state and civil society organisations. As mentioned in the previous subchapter, NGOs such as Restos du Cœur and Banques Alimentaires play an important role in addressing food insecurity, but generally operate within coordinated state-supported governance frameworks rather than functioning as substitutes for absent welfare provision. Public authorities frequently cooperate with nonprofit organisations through formal partnerships, funding arrangements, and institutional coordination mechanisms. The 2016 French anti-food waste law further illustrates this coordinated governance model by legally requiring supermarkets to donate unsold food to charitable organisations, thereby institutionalising cooperation between the private sector, civil society, and the state. This reflects a governance approach in which food insecurity is addressed through integrated public coordination rather than primarily through voluntary charitable responses.

At the territorial level, local authorities retain important competences regarding welfare administration, school meal subsidies, and social aid implementation. However, unlike the strong territorial disparities observed in the United States, French local governance generally operates within more standardised national frameworks and redistributive structures. The préfectoral system additionally allows the central state to maintain oversight and coordination across territories, reducing some of the implementation fragmentation associated with highly decentralised governance systems. While regional inequalities and implementation challenges remain present, the French governance model generally produces stronger institutional coherence regarding food insecurity governance and SDG implementation.

From the perspective of multi-level governance, France illustrates a comparatively coordinated model of SDG 2 governance characterised by stronger institutional integration across governance levels and closer alignment between domestic welfare structures and international normative frameworks. The interaction between national governance traditions, European Union structures, and territorial coordination mechanisms facilitates a higher degree of institutionalisation regarding food-related social rights and sustainable development objectives. At the same time, this governance system demonstrates how supranational institutions such as the European Union can function as important actors in the diffusion and reinforcement of international norms relating to food security, social inclusion, and sustainable development.

5.7.5 Comparative Governance Analysis

Although both countries possess sufficient agricultural capacity and fiscal resources to substantially reduce food insecurity, they differ considerably in how governance competences are distributed across institutional levels, how social protection is coordinated, and how international frameworks relating to food security are incorporated into domestic governance systems.

One of the clearest comparative distinctions concerns the degree of governance fragmentation versus coordination. In the United States, the federal governance system distributes competences relevant to food insecurity across federal, state, and local authorities, producing significant territorial variation in implementation outcomes. Although programmes such as SNAP are federally funded, their administration through state-level agencies creates uneven access conditions and differing implementation capacities across regions. The Iowa case demonstrates how these fragmented governance structures can contribute to persistent food insecurity even in regions with exceptionally high agricultural productivity. Rural inequalities, local administrative limitations, and political variation between states significantly affect access to food assistance and welfare provision, illustrating the governance consequences of decentralised implementation structures.

By contrast, the French governance system reflects a comparatively coordinated and vertically integrated model. Although implementation responsibilities are territorially distributed through regions, départements, and municipalities, governance remains embedded within nationally coordinated frameworks supervised by central state institutions and integrated into European Union governance structures, such as the CAP. Mechanisms such as the préfectoral system, national SDG roadmaps, and Territorial Food Projects facilitate stronger policy coherence and coordination across governance levels. Consequently, the French governance model produces comparatively more standardised implementation structures and reduced territorial variation in welfare access relative to the United States.

The comparison additionally highlights important differences regarding the institutionalisation of international norms and SDG governance. France demonstrates a

stronger degree of institutional integration concerning sustainable development objectives, particularly through the incorporation of SDG implementation into national planning processes and its participation within broader European governance frameworks. The European Union itself functions as an additional governance layer reinforcing norm diffusion through funding structures, regulatory coordination, social inclusion strategies, and CAP frameworks. This supranational governance dimension creates stronger institutional incentives for policy coordination and long-term integration of food security objectives within domestic governance systems.

In contrast, the United States demonstrates a comparatively selective and decentralised approach toward SDG institutionalisation. International frameworks such as SDG 2 primarily function as external reference points rather than internally governing policy structures. The absence of centralised SDG coordination mechanisms limits policy coherence across governance levels and reinforces the dependence of implementation outcomes on domestic political priorities and state-level governance capacities. From the perspective of the Spiral Model, this reflects weaker domestic internalisation of international food-related norms and a greater emphasis on national policy autonomy in relation to international governance frameworks.

The role of supranational governance additionally represents a major comparative distinction between both cases. France operates within the multi-level governance architecture of the European Union, where agricultural policy, anti-poverty initiatives, and food security governance are partially coordinated through EU institutions and funding structures. The CAP, EU social funds, and European food security governance mechanisms such as the European Food Security Crisis Preparedness and Response Mechanism create additional channels of coordination, monitoring, and norm diffusion. These governance arrangements strengthen institutional continuity and create governance incentives that extend beyond purely domestic political cycles. By contrast, the United States lacks a comparable supranational governance layer, meaning that food insecurity governance remains almost entirely dependent on domestic institutional dynamics and intergovernmental coordination.

At the same time, both governance systems reveal important limitations regarding SDG 2 implementation. Despite stronger institutional coordination, France continues to experience territorial inequalities, growing demand for food assistance, and dependence on nonprofit

food aid networks. Similarly, although the United States possesses extensive food assistance infrastructures and significant local innovation, fragmented competences and uneven governance capacity contribute to persistent disparities in access to food support across states and counties. These findings suggest that governance coordination alone does not eliminate food insecurity, but that institutional fragmentation can significantly intensify implementation inequalities and weaken the institutionalisation of food-related social rights.

The comparison also demonstrates differing relationships between state institutions and civil society actors. Within the United States, non-state actors frequently compensate for governance gaps and fragmented welfare provision, particularly at the local level. Food banks, charities, school meal initiatives, and local food policy councils often function as substitute governance mechanisms where state provision remains insufficient or territorially uneven. In France, however, civil society organisations generally operate within more coordinated state-supported frameworks and are integrated into broader governance arrangements through formal partnerships and legal obligations such as the 2016 anti-food waste law. These differences reflect broader welfare governance traditions and differing conceptions of state responsibility regarding social protection and food access.

From a multi-level governance perspective, the comparison ultimately illustrates how governance structures shape not only the effectiveness of food insecurity governance, but also the political meaning of hunger itself. In highly fragmented governance systems such as the United States, food insecurity governance becomes more territorially uneven, conditional, and dependent on local administrative capacity and non-state actors. In more coordinated systems such as France, food insecurity is more strongly embedded within national welfare structures and supranational governance frameworks, facilitating stronger institutionalisation of social protection objectives and food-related norms.

Consequently, the implementation of SDG 2 within affluent democracies cannot be understood solely through economic indicators or agricultural production capacity. Rather, the comparison between France and the United States demonstrates that governance structures, institutional coordination mechanisms, and welfare arrangements fundamentally shape how international norms relating to food security are translated into domestic policy systems. The extent to which SDG 2 becomes operationalised therefore depends heavily on the capacity of governance systems to coordinate implementation across institutional levels,

integrate social protection within broader welfare frameworks, and internalise international norms regarding the right to food and social inclusion.

6. Discussion and Conclusion

6.1 Revision of Key Findings

This thesis examined how France and the United States operationalise international human rights norms and welfare governance in their efforts to achieve SDG 2 and combat food insecurity. In doing so, this thesis aimed to answer the following research questions:

1) *How do states in the Global North operationalise international human rights norms in the context of achieving zero hunger?*

2) *How do different welfare systems realise the strategies, challenges, and implications of achieving zero hunger in France and the US?*

Through a comparative qualitative analysis guided by the Spiral Model, Welfare Regime Theory, and Social Origins Theory, the research proved that hunger remains prevalent in affluent democratic nations. The reasons include that many political leaders falsely claim that hunger is primarily the result of food scarcity, when the facts prove that institutional, political, and socio-economic structures that shape access to food are far more important.

The findings demonstrate that welfare regimes strongly influence how food insecurity is governed, framed, and addressed. France's more state-centered and rights-oriented welfare model generally treats food insecurity as part of broader social protection and collective solidarity frameworks, while the US's liberal welfare model relies more heavily on market mechanisms, targeted welfare programs, and charitable food assistance. The research further found that differing levels of engagement with international human rights norms shape domestic approaches to food governance and the framing of the right to food.

In addition, non-state actors emerged as essential governance actors in both countries, but their roles differ significantly. In the United States, non-state actors frequently compensate for structural gaps in welfare provision, whereas in France they operate more as complementary actors within an institutionalised welfare framework.

Furthermore, the findings demonstrated that food security governance in both France and the US operates through a complex structure involving international, supranational, national, regional, and local actors. However, the institutional organisation of these governance levels differs significantly between the two countries. In France, food security governance is embedded within a more coordinated and centralised administrative system that is simultaneously influenced by EU frameworks like the CAP, anti-poverty initiatives, and broader EU sustainability strategies. National ministries and regional authorities operate within relatively integrated governance structures that facilitate policy coherence and stronger institutional coordination. In contrast, the US reflects a more fragmented federal governance model in which responsibilities concerning food assistance and welfare are distributed unevenly between federal, state, and local authorities. While federal programmes such as SNAP and WIC establish overarching frameworks, implementation varies considerably across states and administrations due to differing political priorities, administrative capacities, and welfare approaches. The Iowa case study particularly illustrated how state-level resistance, adaptation, and negotiation regarding federal nutrition programmes can create uneven implementation outcomes and territorial disparities in access to food assistance. Overall, the research found that governance coordination and institutional coherence play a major role in shaping the effectiveness of implementing measures to achieve zero hunger. France's stronger vertical integration between EU, national, and local governance levels contributes to more coherent policy implementation, whereas the decentralised federal structure of the US often produces fragmented and territorially unequal food security outcomes.

Overall, the thesis demonstrates that persistent hunger in the Global North reflects governance failures, unequal access to social protection, and differing institutional understandings of welfare and socioeconomic rights rather than insufficient national wealth or food availability.

6.2 Interpretation of Welfare Governance, Human Rights, and Persisting Hunger

The findings further demonstrate that the persistence of hunger in the Global North reflects broader tensions within contemporary welfare governance and the implementation of SDG 2. Although both France and the US publicly support the objective of reducing food insecurity, the research suggests that the existence of economic resources alone cannot guarantee

equitable food access. Instead, the effectiveness of food security governance is closely linked to how states conceptualise social responsibility, welfare provision, and the role of human rights within domestic policy frameworks. The findings therefore reinforce existing literature arguing that hunger in affluent democratic nations is first and foremost a political and structural issue rather than economic or technical.

One of the central interpretations emerging from the research concerns the uneven internalisation of international human rights norms. Risse and Sikkink's spiral model provides a useful framework for understanding how international norms surrounding food security and social rights influence domestic governance even when states resist formal legal obligations. The comparison between the two countries suggests that international human rights norms can shape political discourse, institutional behaviour, and civil society mobilisation without necessarily producing full legal internalisation. France's greater alignment with multilateralism and social rights frameworks reflects a stronger acceptance of collective welfare obligations and international norm diffusion. In contrast, the United States continues to demonstrate resistance towards economic and social rights discourse, especially when it comes to state obligations related to access to food. Nevertheless, the findings indicate that advocacy networks, local actors, and CSOs continue to pressure institutions and shape public discussions surrounding hunger and food insecurity even within contexts resistant to rights-based approaches. This demonstrates that international norms may influence governance indirectly through socialisation processes rather than solely through formal legal incorporation.

The findings also reveal important contradictions regarding the role of non-state actors in food security governance. NGOs, charities, food banks, and advocacy organisations are crucial in addressing immediate food insecurity and supporting vulnerable populations. Their presence reflects the inability of state institutions alone to adequately respond to complex and rapidly changing social needs. On the other hand, the increasing institutionalisation of charitable food systems raises questions regarding state accountability and the long-term sustainability of emergency food aid models. The findings suggest that non-state actors simultaneously alleviate hunger while potentially normalising welfare reduction and fragmented social protection systems. This contradiction is particularly visible in the United States, where the extensive reliance on charitable food assistance reflects not only strong civil society engagement, but also structural limitations within welfare provision itself. In this

sense, food banks and non-profit food networks may reduce immediate suffering while unintentionally stabilising systems that reproduce food insecurity. The research therefore supports critical scholarship arguing that charitable food systems can shift hunger from the domain of social rights into the domain of philanthropy and voluntary action.

At the same time, the findings suggest that the relationship between states and non-state actors is shaped significantly by broader welfare structures. Rather than functioning uniformly across contexts, non-state actors assume different roles depending on institutional arrangements and political traditions. In more liberal welfare systems, non-state actors are more likely to compensate for limited state intervention, while in stronger welfare systems they operate more as complementary actors integrated within a broader institutional framework. This distinction is significant because it demonstrates that the presence of large non-profit sectors does not necessarily indicate effective welfare governance but could rather reveal underlying structural weaknesses in social protection.

Another important consideration concerns the limitations and contradictions of multi-level governance in implementing SDG 2. The findings indicate that food security governance increasingly depends on interactions between the different levels. While this approach may increase policy flexibility and allow for localised responses to food insecurity, it can also diffuse responsibility and produce uneven implementation outcomes. In France, stronger coordination between European Union institutions, national authorities, and local governance structures continues to comparatively greater policy coherence. However, even within this more integrated framework, implementation gaps and territorial inequalities remain present. In the United States, the federal structure creates greater fragmentation, allowing significant variation in food assistance implementation and access between states and localities. The findings therefore suggest that decentralised governance structures may improve adaptability while simultaneously weakening accountability and producing inconsistent access to food assistance across territories.

The research additionally highlights an important tension between symbolic and substantive commitments to the 2030 World Agenda and particularly SDG 2. Both France and the United States formally participate in international food security initiatives and publicly support the reduction of hunger. However, the findings suggest that rhetorical support for SDG 2 does not necessarily translate into comprehensive structural transformation capable of eliminating food insecurity. The persistence of hunger in both countries indicates that international

development objectives alone are insufficient without broader institutional commitment to reducing inequality, strengthening social protections, and addressing structural barriers to food access. Consequently, this thesis supports broader critiques within SDG literature arguing that implementation gaps often emerge when international commitments are not accompanied by coherent domestic governance strategies and enforceable accountability mechanisms.

6.3 Implications of the Findings

The findings of this thesis strongly support the arguments presented throughout the literature review. The notion that hunger is a "human-made phenomenon" is reflected in the case study, as both countries possess significant economic and agricultural resources yet continue to experience persistent food insecurity. The comparison between France and the United States also supports literature arguing that the right to food is unevenly institutionalised within domestic governance systems. France demonstrates stronger integration of social welfare principles and SDG-related governance, reflecting greater alignment between international human rights norms and domestic policy frameworks. Conversely, the US maintains a more fragmented and selective approach, where food assistance programmes are generally framed as policy tools rather than enforceable rights-based obligations. These findings therefore challenge existing assumptions that economically developed democracies naturally internalise and operationalise international human rights norms.

The research additionally contributes to literature on welfare governance and food insecurity in the Global North. The findings demonstrate that welfare regime structures significantly influence how hunger is addressed institutionally. France's more coordinated corporatist welfare system generally produces stronger policy coherence and integration between welfare provision and food security governance, as well as intentional and structured cooperation with the non-state sector. In contrast, the United States' decentralised liberal system contributed to uneven implementation, stronger and yet haphazard dependence on charitable actors.

The findings also carry broader implications for the governance of the SDGs themselves. The research demonstrates that the voluntary nature of the SDGs creates substantial differences in domestic implementation. France's stronger engagement with multilateralism appears to

encourage greater institutional integration of SDG objectives, whereas the US demonstrates a more selective approach due to their prioritisation of domestic policy and autonomy.

Furthermore, the lack of an established NHRI in the United States is a clear indicator that the country has been reluctant to fully institutionalise international human rights norms within its domestic governance framework. Human rights oversight remains fragmented across CSOs and specialised agencies rather than being consolidated within an independent national institution, despite longstanding domestic and international calls for the establishment of a fully accredited NHRI. This reluctance is further reflected in the US' refusal to ratify the ICESCR, its repeated opposition to recognising food as a human right, and its withdrawals from a number of international organisations and bodies concerned with human rights and multilateral cooperation. Taken together, these developments suggest a governance approach that prioritises domestic policy autonomy over participation in international human rights accountability mechanisms.

By contrast, France has historically demonstrated a stronger commitment to the internationalisation of human rights. As the first country to establish an NHRI in 1947, through the CNCDH, France has played a pioneering role in the development of national human rights institutions. The CNCDH actively contributes to UN human rights mechanisms, including the Universal Periodic Review. France has ratified both the ICESCR and its Optional Protocol and consistently supports the recognition of the right to food within the United Nations system. Furthermore, the constitutional status afforded to ratified international treaties in France provides international human rights instruments with a stronger legal standing domestically. These differences suggest that engagement with international human rights institutions and accountability mechanisms may influence the extent to which food security is framed and implemented as a rights-based obligation rather than solely as a matter of public policy.

The presence of an NHRI in a country is significant in the context of economic, social, and cultural rights, as these rights often depend on continuous monitoring of government policies, resource allocation, and implementation rather than solely on judicial enforcement. Particularly, the right to food requires states to progressively realise access to adequate food through legislative, administrative, and social measures, making independent oversight mechanisms especially important. NHRIs monitor state compliance with international

obligations, assess the human rights impacts of public policies, provide recommendations to governments, facilitate engagement between civil society and state actors, and raise awareness of right-based approaches to social issues. The French CNCDH has recently used these functions to contribute to debates surrounding food security. The absence of a comparable institution in the US therefore represents more than a symbolic gap in their human rights architecture, as it also limits the existence of a mechanism capable of framing food security as a human rights issue.

The above findings challenge the assumption that food insecurity in the Global North is only temporary or marginal. Instead, the persistence of hunger in both case studies suggests that food insecurity has become structurally embedded within broader socioeconomic inequity, welfare governance systems, and political ideology.

6.4 Limitations of the Research

This thesis contains some limitations that should be acknowledged when interpreting the findings. First, while the countries for the case study were selected because they represent different traditions and approaches toward food security governance, the findings cannot be generalised to create a statement about the right to food in the global north. While other states may demonstrate similar institutional structures, welfare models, and levels of engagement with SDG implementation, factors such as history, economic standing, and stability in political and economic ideology could lead to different analysis.

A further limitation relates to the qualitative nature of the research design. The thesis primarily relies on secondary sources, policy documents, institutional reports, and academic literature rather than empirical research such as interviews. Thus, the analysis depends on the availability, reliability, and interpretation of existing data. Although this approach remains appropriate for examining governance structures, welfare systems, and international legal frameworks, it limits the ability to directly assess the nature of food insecurity among affected populations in the Global North.

Additionally, the research focuses primarily on governance, welfare institutions, and the implementation of SDG 2 rather than providing an extensive quantitative analysis of food insecurity trends. While statistical data and institutional indicators were incorporated

throughout the thesis, this study does not aim to provide a comprehensive economic evaluation on food security. Consequently, some socioeconomic variables influencing food security may not have been fully. Furthermore, there is a large temporal aspect to this thesis. Factors such as inflation, climate change, and political shifts continue to influence food security in rapidly changing ways.

Despite these limitations, the findings remain valid for answering the central research question of this thesis. The comparative approach, combined with the use of established theoretical frameworks and academic literature, provides a strong basis for analysing how human rights norms shape hunger and food insecurity in the Global North.

6.5 Recommendations and Future Research

Regarding future steps, it would be interesting to further explore how additional countries tackle achieving zero hunger, including any countries that can be used as a success story and an example for other countries in the Global North on how to use their resources in the most efficient manner. For example, comparative studies involving Nordic countries or Canada might provide more insight on welfare governance and the right to food. Examining a country like Germany that has robust federal structures but also frequently engages in multilateralism could also be interesting. Furthermore, future studies could benefit from interdisciplinary research to examine the long-term effects of inflation, climate change, and political and economic instability on food security in the Global North.

6.6 Concluding Remarks

In attempting to provide a solution on ensuring food security for all, Vaclav Smil calls for the need for productivity improvements, in line with SDG 2's sub goal of closing the gap between potential and actual yield per unit area. As for increasing the total yield of agriculture, Smil emphasises that it is only logical and necessary in low income countries, as food availability is not a hindrance in the Global North. Moreover, he states that reducing food supply coupled with the implementation of policies to minimise wholesale, storage, and distribution losses will greatly reduce the amount of food waste produced. In addition to these larger policies, he expresses the need for small and incremental changes, such as reducing portions served in restaurants and not putting excessive food supply on the retail market.

Lastly, Smil concludes his book by stating that the steps needed to provide the next generations with an adequate food supply are not radical, the only real needs are to increase the efficiency during the production process, reducing food waste, adjusting diets, and promoting measures that reduce the negative environmental impact of food production.[225]

Food security in the Global North is heavily dependent on economic prioritisation, political will, rights-based governance, and the internalisation of international human rights norms into domestic policy. It is achievable when access to adequate and nutritious food is treated as a fundamental right as recognised in the UDHR, the ICESCR, and numerous other norms, rather than a form of charity. Durable progress towards achieving zero hunger depends on states adopting comprehensive and accountable welfare systems and the acceptance of multilateralism and multi-level governance in the international arena as it is a strong indicator for established human rights' policies domestically.

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