



DietWise

SYSTEMIC CHANGES | EMPOWERED CITIZENS

Deliverable D 11.2

OEI.2 Requirement No.3

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<https://www.dietwise.eu>

This work is dedicated to the memory of Justina Baršytė, author of the DietWise project idea, whose vision and commitment were invaluable to this project.

Project information

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Abbreviations

Abbreviation	Full Form
AI	Artificial Intelligence
APC	Author Processing Charges
CA	Coordination Action / Consortium Agreement
CF	Co-Funded Partnership
CfP	Call for Proposal
D&C	Dissemination and Communication
DECP	Dissemination, Exploitation and Communication Plan
DoA	Description of Action
EC	European Commission
EU	European Union
F2F	Face-to-Face
GDPR	General Data Protection Regulation
HEU	Horizon Europe
HQ	Headquarter
IO	International Organization
JRC	Joint Research Centre
KM	Knowledge Management
KPIs	Key Performance Indicators
LFI	Lead Financial Institution
MEPs	Members of the European Parliament
M&E	Monitoring & Evaluation
NGO's	Non-Governmental Organizations
SMA's	Social Media Accounts
WP	Work Programme
WP#	WP followed by a single digit number refers to a specific Work Package

OEI.2 – requirement 3

This deliverable contains the Ethical assessment by the External Ethical Advisor (EEA) prof.dr. Maggie Geuens, which can be found in Appendix 1.

The EEA has evaluated the activities along 4 dimensions, which can be found in Table 1.

Table 1. Summary of Ethical Assessment and Dietwise Action Points.

Evaluation Dimension	Assessment	Remark	Action plan Dietwise
Humans	Ok, but invitation to protect vulnerable groups. Informed consents forms not accessible.	The informed consents have not been translated for assessment	Translating the informed consent. Screening and if necessary adapting the processes to address vulnerable groups before data collection
Personal Data	Protect participants' identities and data	DMP has not been shared with the EEA, all procedures have been installed	Share DMP with EEA before the next assessment round
Environment, health, and safety	Positive		
Artificial Intelligence	Positive		



Report by the Independent Ethics Advisor or Ethics Advisory Board

Funding Programme	Horizon Europe
Call	HORIZON-CL6-2024-FARM2FORK-01
Grant Agreement Number	101181692
Acronym	DietWise
Project Title	Systemic Solutions to Enhance Healthy and Sustainable Food Provision and Cooking at Home
Project start date-end date	2024-11-01 - 2027-10-31
Period covered	2024-11-01 – 2026-04-30

1. Name and contact details

Prof. Dr. Maggie Geuens (Ghent University)

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2. Area of expertise and concise description of educational and professional background

Maggie Geuens holds a PhD in Business Economics from the University of Antwerp (1998). Prior to joining Ghent University in 2000, she served as an Assistant Professor at the Free University of Brussels, from 1998 to 2000, where she taught the courses Marketing Management, Marketing Research, Marketing Communications, and Seminar Marketing. During a period of ten years (2002 to 2012), she held key leadership roles at Vlerick Business School, including Program Director of the "Master in Marketing Management" (2000-2002), Director of the "Marketing Communications Research Center" (2000-2004), and Academic Director of the Brand Management Centre (2005-2012). Since 2006, Maggie is appointed Full Professor at Ghent University, teaching courses like Marketing Management (2000-ongoing), Consumer Behavior (2002-ongoing), Strategic Brand Communications (2002-2014), and Current Developments in Marketing (2002-2014). In this capacity, she has also served as Vice Dean Research (2018-2022) and Chair of the Research Committee of the Faculty of Economics and Business Administration for a total of fifteen years (2001-2012; 2018-2022). She also served as a member of the ethics committee of Ghent University for one year.

Research wise, Maggie's main fields of interest are in marketing communications and consumer behavior, with a specific focus on encouraging healthy and sustainable consumption patterns. In these domains, Maggie has already secured funding for more than 20 projects as a main or co-applicant. This funding allowed to recruit an equal number of PhD students for four years. To date, under her (co-) supervision, 27 PhDs have been successfully defended, of which six during the past five years. Together with her co-authors, Maggie has meanwhile realized a research output of 81 Web of Science (A1) publications. For her full career, her Google Scholar h-index is 53 and her Google Scholar citations amount to 16,293. For the period from 2021 onwards, these numbers are 35 and 6001, respectively.

3. Declaration on independence and absence of conflicts of interest

The undersigned, Maggie Geuens, appointed as independent Ethics Advisor / Ethics Advisory Board Member, for the project [ACRONYM] [GA Number], declares that:

- he/she/they will execute his/her/their responsibilities in full independence of other professional and academic commitments;
- he/she/they is not affected by any conflict of interest arising in particular from any economic or professional interests, from family or other personal links, or from any other relationships or common interests which may compromise the independent nature of the report provided;
- there are no other professional or financial constraints to carry out the required assignment or that would compromise the independent nature of the report provided;
- he/she/they will notify the Beneficiary/Coordinator/Principal Investigator without delay if the above situation changes, particularly in such a way as to compromise the independent nature of the report.
- he/she/they will not reveal any information about the project's activities and its outcomes, without the express written approval of the Beneficiary/ies or the Commission/Executive Agency/Funding Body.



Date: 28 April 2026

Signature: Maggie Geuens

4. Description of the independent Ethics Advisor's mandate, including starting and ending dates of involvement

Please describe how the mandate included in the Ethics Summary Report has been implemented. If applicable, describe any changes in appointment or mandate of the Ethics Advisor/Board Members.

I was appointed as Ethics Advisor on March 11, 2025 and received the first documents in April 2026. The goal is to prepare a report at the end of each reporting period. Specific attention will be given to the following ethics topics and how any issues in this regard are addressed, and what mitigation measures and safeguards will or can be put in place:

- Humans (i.e., the involvement of participants, also of vulnerable groups (including children), in activities such as workshops, pilots, and training, which may need deliberation on potential incidental findings and appropriate protocols, data protection, etc. in this regard).
- Personal data (e.g., sensitive personal data is collected through surveys, psychometric tests, experiments, and focus groups; personal data will be transferred between the EU and non-EU countries via different tools and platforms; and different communication means will be used: are GDPR rules and the necessary security measures sufficiently respected in this matter).
- Environment, Health and Safety (i.e., the behavioral interventions that will be tested involve the intake of food, which could cause harm to participants).
- Artificial Intelligence (i.e., the AI-based tools that will be developed involve deep learning and analysis of big datasets, which could generate biased recommendations)

5. Received documents

I received the following documents:

Documents related to ethical approval:

- | | |
|------------------|---|
| D2.1, D2.4, D4.1 | Approval statement IRB Greece Research for (application documents are missing) |
| D3.1 | Ethical Self-Assessment Form submitted to Lithuanian institution for D3.1 (I had no access to the links concerning the informed consent and debrief document) |
| D4.1 | Informed Consent Forms for workshops with elderly, citizens and influencers (these were in Lithuanian) |

Completed reports concerning the following deliverables:

- | | |
|------|--|
| D2.1 | Report on existing nutrition guidelines, promotion systems and schemes |
| D2.2 | A better understanding of the needs, barriers, and drivers of citizens for uptaking beneficial tools and applications: survey in multiple EU countries |
| D2.3 | Mapping relevant influencers by describing their needs, attitudes, and practices |
| D2.4 | Report on needs, barriers, and drivers of vulnerable citizens |
| D3.1 | Report on social influence and norms interventions |
| D4.1 | Co-creation workshops |
| D4.2 | Co-Development of ICT Solutions |

Draft documents for future deliverables:

D5.1 (??)	Self-assessment concerning Assessment List for Trustworthy AI
D5.2	ICT Solutions
D5.3	Pilot implementation plan for Belgium
D5.4	Pilot implementation plan for Greece
D5.5	Pilot implementation plan for Lithuania

6. Ethics analysis and recommendations

I have carefully read all documents, with a specific focus on the methodology of the studies and ethical-related issues. Below, I summarize my findings and suggestions across the past and future studies, categorized into the four categories for which an external advisor was deemed appropriate (i.e., humans; personal data; environment, health, and safety; and artificial intelligence).

6.1 Humans

An 'informed consent' document should be available for every study in which primary data is collected. This will need to differ for an anonymous survey compared to in-depth interviews or focus group discussions that are recorded and transcribed. This also applies to expert interviews, not only to samples from the 'general public'. Although I have the impression that the authors did use 'informed consent' documents for most (if not all) their studies, it is not always clear to me what these documents exactly entailed (some documents were in Lithuanian, others just mentioned that approval was obtained without providing the exact content). Hence, I cannot evaluate whether all necessary components were included. As a general recommendation, it would be helpful to include the documents submitted for ethical clearance. At a minimum, an informed consent document should inform participants:

- on the nature of the questions in the study (including that there are also some sensitive questions, cf. food security, religion, and income are asked in almost every study, which classify as sensitive questions);
- that their participation is entirely voluntary;
- that by filling out the questionnaire, they give permission to the researchers to store, analyze, and report their data anonymously;
- that they could stop their participation at any time.

Key components of the project concern 'vulnerable target groups.' These involve, amongst other things, questioning on 'sensitive issues.' From an ethical perspective, precautionary measures could be taken during such data collection to safeguard the mental well-being of these groups, e.g., by providing clear information at the end of the data collection process about organizations where they can raise their concerns or seek information (websites, organizations, helplines, etc.). In almost every study, the researchers measure food insecurity (through the following questions: "Was there a time when, because of lack of money or other resources, you were worried you would not have enough food to eat?; you were unable to eat healthy and nutritious food?; you ate only a few kinds of foods?; you had to skip a meal?; you ate less than you thought you should?; your household ran out of food?; you were hungry but did not eat?; you went without eating for a whole day?"). If not necessary, I would consider leaving this measure out in future studies. If needed, I would recommend including a response option "I'd rather not answer this question." I noticed that this was done in one of the studies. It is certainly good practice to do so in future studies as well. In addition, whenever this measure is used, it may be a good idea to provide "help" information (as mentioned before).

D5.4 (Greek study) focuses on 'vulnerable population groups in educational settings.' It is unclear to me whether primary school children or students (aged 18+) will be interviewed. The document uses the terms children and students, which is a bit confusing. Although I would not have expected that young children would be involved in this project, Tables 1 & 2 in the document of D5.4 mention that 300 children younger than 18 will be interviewed. If so, it is important to clarify how parents will be involved. Do they need to be informed or do they also need to give consent? Depending on the country, for example, it may be mandatory to seek parental consent if the child is under 14, and after that age, simply to inform the parents (these age limits may vary between countries). How will the researchers deal with this? What exact document will be presented to the parents? In addition, how will the informed consent of the children look like? How will this consent be sought from (young) children in a language they can understand? Of course, the latter depends on the children's age.

Questions were always phrased in a respectful manner. It is also appreciated that the researchers took measures to make respondents feel at ease. For example, for the workshops, a neutral and easily accessible location that fosters open dialogue and inclusivity was considered a prerequisite. Attention was also paid to how the environment affected participants' behavior and comfort. In addition, participants had the opportunity for brief questions and closing remarks at the end of the session.

Conclusion: the researchers already do a good job, but could perhaps go a step further in addressing vulnerable groups and vulnerable questions.

6.2 Personal data

There are frequent references to the anonymization and, sometimes, pseudonymization of the collected data. However, it is unclear what happens to the raw data (e.g., recordings and transcripts of interviews or focus group discussions, i.e., the non-anonymous data). Where and how are they stored? Are they destroyed as soon as possible after anonymization? Is it retained for a period of time? If so, is this in a different location from the anonymized data? Why and for how long? Who then has access to it? The data management plan, for example, states that such personal data may be shared with third parties or other research groups within the project. Is this necessary? If so, why? If not, I would suggest not allowing this. In the case of pseudonymized data, there is, in principle, a trail from the raw data to the pseudonymized individuals. This requires a key file that links pseudonyms to the actual participants. This is also very relevant for the future studies where participants will be linked via their email address. I would suggest storing these three files separately, and providing access to the raw data and keys only to the researchers. In accordance with the 'data minimization' principle, the necessity of retaining certain data (raw data, keys) should be explained for each of the studies. None of this is currently explained. Some elements of these are mentioned in document D2.1 D2.4 D4.1 which shows ethical approval of the Greek Ethics Committee, but unfortunately, the document only shows ethical clearance and not the researchers' document that was submitted for ethical clearance.

For expert interviews: names are not mentioned, but descriptions are provided. This is normal, but it would be good to double-check whether it is not possible to identify them based solely on the descriptions that will be published in documents or manuscripts.

Conclusion: If the researchers have not done so already, or do not intend to in their future studies, I would suggest that they take measures to protect participants' identities and data, and carefully consider what to store, where, and for how long.

6.3 Environment, health, and safety

The recommendations on swapping ingredients in recipes for healthier alternatives were developed in multiple steps (different work packages). For example, next to a literature review, the researchers (1) investigated consumers' needs and barriers concerning healthy and sustainable food intake by means of a questionnaire; (2) they engaged different stakeholders (citizens, influencers, and vulnerable citizens) in structured co-development activities, focusing on translating user needs into actionable functional requirements and interface expectations, and (3) they had extensive discussions with the nutritional experts that played a central role in co-developing and adapting the ICT solutions. This procedure ensured that the input for the AI system is, at the same time, relevant to customers (as it takes their needs/barriers into account) and, most importantly, aligns with the national guidelines on healthy and sustainable food consumption and safeguards participants from harm.

Conclusion: The procedures the researchers followed seem correct and appropriate to me. Especially the fact that nutrition experts are continuously involved seems to limit health and safety risks.

6.4 Artificial Intelligence

The AI system was developed with great care through multiple steps. The AI system is rule-based and human-controlled and can only deliver output from a dataset curated by nutritional experts. The researchers will also inform participants, through onboarding materials, about how the recommendations were developed. As such, the system can be classified as low-risk to human autonomy & human harm.

The researchers have put measures in place to protect dataset security, data integrity & participants' privacy and have defined fallback measures for primary failure scenarios. The system also aligns with general standards for data management and governance.

Researchers carefully checked every aspect included in the ALTAI. Their argumentation that they have developed a low-impact and low-risk AI system is very convincing. In addition, the researchers will check and revise the AI system's adherence to the Assessment List for Trustworthy AI (ALTAI) every six months.

As the researchers acknowledge, it is important to continue improving the AI system to ensure that the % of recipe ingredient "swap" recommendations appropriate according to nutritional experts is as high as possible. The goal for the wider dissemination phase is currently set at 95%. This seems appropriate, given that the swaps are very unlikely to result in "unhealthy" or "risky" recipes (e.g., swapping white pasta for wholewheat pasta).

Conclusion: The researchers have put much effort into making the AI system as good, bias-free, and harm-free as possible. Regularly testing and improving the system is recommended (which the researchers already intend to do).

As a general conclusion, I would like to mention that I'm impressed by the project and appreciate the efforts and measures the researcher have undertaken to address ethical concerns. I hope the above recommendations help them to meet the ethical standards in areas where this would not yet be the case. I congratulate them with a job already very well done.

A handwritten signature in blue ink, appearing to read 'Maggie Geuens', with a stylized flourish extending to the right.

Date: 28 April 2026

Signature: Maggie Geuens