



‘Ultra-processed foods’

POSITION PAPER

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Food provides nutrition to look after our bodies and energy to power us through the day. Good food and drink are also woven into the fabric of European culture and are central to our time spent with friends and family.

However, today more than half of the European adult population and a third of children are overweight or obese, while malnutrition remains a major challenge. We also face major environmental issues including the climate emergency and biodiversity loss.

In the search for effective solutions, the use of ‘ultra-processed food’ terminology, and associated classifications, will hamper EU efforts to improve public health and environmental outcomes.

This paper outlines the limitations of ‘ultra-processed food’ terminology and provides alternative solutions to meet our collective goals.

1 **More processed’ food does not mean ‘less healthy’ or worse for the environment**

On the contrary, it is often processing and food product formulation that improve our food.

For example, food fortification enhances the micronutrient content of a product and reformulation can increase fibre or reduce the fat, salt, and sugars content, in line with EU policy objectives.

In addition, with consumers increasingly choosing their diet based on environmental impact, processed food provides products for vegans, vegetarians, flexitarians, and meat eaters alike.

2 **‘Ultra-processed food’ classifications are illogical and contradict the scientific evaluation of foods**

based on nutrient composition and portion guidance. There is no legal definition of ‘ultra-processed food’ at EU or global level.

Researchers from the University of Surrey and European Food Information Council looked at over 100 scientific papers on processing classifications and **concluded** that “most classification systems are not aligned with existing evidence on nutrition and food processing.”

NOVA is the most widely referenced food classification system based on the level of processing but there is a **growing body of evidence** that expose fundamental weaknesses in this, and similar classifications.

3 **‘Ultra-processed food’ terminology confuses everyone, from nutritionists to consumers and beyond**

A recent **study in France** asked 170 nutrition and food science experts to categorise a range of foods based on the NOVA classification. Confusion reigned as they put ‘ultra-processed foods’ into healthier categories and ‘healthy foods’ into the ‘ultra-processed foods’ category. If experts are confused, **what chance do consumers have?**

Confusion at breakfast

Croissant from the local bakery

Not ultra-processed*

Wholegrain bread from the supermarket

Ultra-processed*

* According to NOVA classification

4 There are many unintended consequences to warning consumers off 'ultra-processed foods'

- a. **Healthier foods threatened:** Many nutritious supermarket products would be caught up in UPF classifications including wholemeal bread, low-fat fruit yoghurt and vegetable soup.
- b. **Public health targets undermined:** The avoidance of foods deemed as 'ultra-processed', even when they have a healthy nutrient profile, could decrease intake of dietary fibre and micronutrients.
- c. **Artisanal, traditional foods threatened:** Consumers could deem artisanal and traditional products such as charcuterie and pastries as 'ultra-processed' and avoid these foods as a result.
- d. **Innovation undermined:** Guidelines based on food processing could be misinterpreted to mean that processing is bad and cause consumer rejection of vital food innovations that contribute to more sustainable food systems.
- e. **Assumptions on homemade:** With the right proportions and ingredients you can cook healthily at home, but it cannot be assumed that homemade is healthier.

5 Food safety at the heart of public policy

The food and drink industry puts consumer safety first. If food is not safe, it is not food.

For example, every additive must undergo a rigorous safety assessment by the European Food Safety Authority before its use.

In addition, the food and drink industry continues to support research into the relationship between food processing and potential impacts on our health, the environment and food safety.

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6 There are better solutions to improve health and sustainability

If 'ultra-processed food' classifications won't help improve our health or protect the environment, what will?

- a. **A healthy diet:** Help consumers consider the nutritional composition of a product alongside frequency of consumption, portion size, and lifestyle.
- b. **Innovation:** Support innovations, such as reformulation and fortification, to provide products like low fat spreads, low sugar drinks or fortified cereals.
- c. **Education:** Provide consumers with information to choose a healthy diet through labelling, **awareness campaigns**, and education for all ages.
- d. **Food environments:** Make it easier to choose healthy and sustainable diets.
- e. **Marketing and advertising:** Ensure advertising and marketing is decent and truthful, encouraging programs such as the **EU Pledge** and national initiatives.
- f. **Lifestyle:** Promote a healthy lifestyle, including physical exercise, alongside a healthy and balanced diet.

ABOUT FOODDRINKEUROPE

FoodDrinkEurope represents Europe's food and drink industry, one of Europe's largest manufacturing sectors in terms of turnover, employment and value added.

T: +32 2 514 11 11 E: info@fooddrinkeurope.eu
Avenue des Nerviens 9-31, 1040 Brussels, Belgium.

Learn more about the food industry commitment to tackling health and environment issues [here](#)

