‘Ultra-processed foods’

POSITION PAPER

FOODDRINK EUROPE

Food and drinks provide nutrition to look after our bodies and energy to power us through the day. Food and drinks 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’ does not mean ‘less healthy’ or ‘less sustainable’

Whether a food is ‘ultra-processed’ or not, tells us nothing about whether it is ‘nutritious’ or not. All foods can be part of a healthy diet, where consumers consider the overall nutritional value of what they’re eating, how much, how often, how it fits with an active lifestyle.

In fact, food processing can even boost the nutrient content of a product with fortification techniques or reformulation to increase fibre or reduce the fat, salt, and sugars content.

In addition, with consumers increasingly choosing their diet based on environmental impact, processed foods provide the range of choice for vegans, vegetarians, flexitarians, and meat eaters alike.

2 Ultra-processed food classifications are flawed

Ultra-processed food classifications are built on faulty assumptions about the level of processing and health outcomes. That’s why public authorities across Europe, including the **UK**, **Nordic** countries and **France** all reject the use of the ultra-processed food concept as a basis for developing public health policy because it lacks scientific consensus and it risks undermining existing public health efforts.

NOVA is the most widely referenced UPF classification system but there is a growing **body of evidence** that exposes fundamental weaknesses in its approach.

3 Ultra-processed food terminology confuses everyone, from experts to consumers

A recent **study** in France asked 170 nutrition and food science experts to categorise a range of foods based on the NOVA classification.

The experts did not give the same NOVA classification to the same foods, leading to an inconsistent identification of ultra-processed food.

If the experts can’t agree, **what chance do consumers have?**

*dependent on specific formulation and one's reading of the NOVA classification

4 There are many unintended consequences to targeting ultra-processed foods

Healthier foods targeted: Many nutritious daily essentials could fall under UPF classifications, including wholemeal bread, plant-based protein products, and specialised nutrition (e.g. gluten-free, lactose-free etc.).

Counter-productive to public health: The avoidance of foods deemed as ultra-processed, even when they have a healthy nutrient profile, could decrease the intake of dietary fibre and micronutrients.

Artisanal, traditional foods threatened: many of Europe's culinary icons could be classed as UPFs and could fall foul of negative perceptions and restrictions.

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.

Affordability risks: a 2024 **study** curated two menus, one of mostly minimally-processed foods and the other of mostly UPFs, and found that the minimally-processed menu was more than twice as expensive and expired three times faster than the UPF menu, without being 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.

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 healthy diet: Help consumers consider the nutritional composition of a product alongside frequency of consumption, portion size, and lifestyle.

Innovation: Support innovations, such as reformulation and fortification, to provide products like low fat spreads, low sugar drinks or fortified cereals.

Education: Provide consumers with information to choose a healthy diet through labelling, **awareness campaigns**, and education for all ages.

Food environments: Make it easier to choose healthy and sustainable diets.

Marketing and advertising: Ensure advertising and marketing is decent and truthful, encouraging programs such as the **EU Pledge** and national initiatives.

Lifestyle: Promote a healthy lifestyle, including physical exercise, alongside a healthy and balanced diet.

ABOUT FOODDRINKEUROPE

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

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Learn more about the food industry commitment to tackling health and environment issues here

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