

TACKLING ULTRA-PROCESSED FOOD FOR A HEALTHIER AND JUST FOOD SYSTEM

POLICY PRÉCIS

The situation

Ultra-processed foods (UPFs) have become central to the European public health debate due to their increased (over)consumption and the health problems linked to it. The consumption of UPFs varies significantly across the European region. While it averages 27% of total daily energy intake across Europe, this fluctuates from 14% in Italy and Romania to 44% in the UK and Sweden.¹

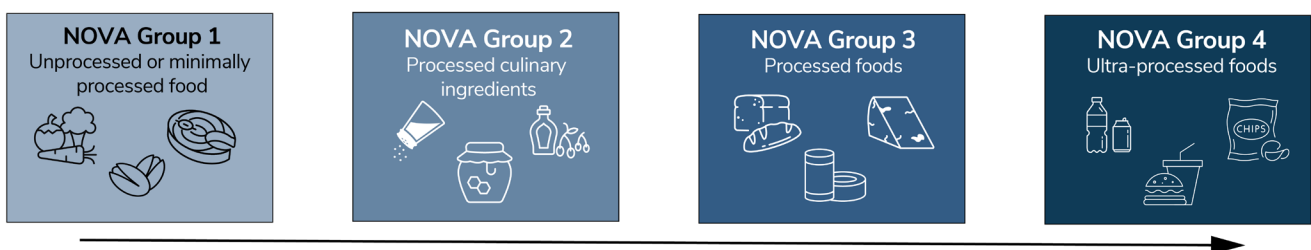
This problem does not affect everyone equally due to the social gradient in the overconsumption of UPF. Younger generations,² people with lower socioeconomic status,³ and people in urban areas⁴ generally consume more. Differences also emerge across regions and race/ethnicity.⁵ Findings on the links with education are mixed, as lower education levels are not always associated with higher UPF intake.^{6,7} Clearly, there are significant public health inequalities associated with UPF consumption, which require targeted policy actions.

For anyone following the public debate on UPFs, it may seem **difficult to define exactly** which foods qualify as UPFs. This problem arises because **food processing exists on a continuum rather than a dichotomy**. For example, while adding salt to tuna and putting it in a can with some olive oil is processing the food, this does not mean a can of tuna is ultra-processed.

In a contemporary industrialised society where food is packaged, transported, and preserved for weeks, relying solely on unprocessed food is almost impossible. Therefore, understanding the difference between processed and ultra-processed food is important.

The NOVA model⁸ (graph below) helps us understand the difference by categorising food into four groups.⁹

1. **Unprocessed or minimally processed food (NOVA group 1)** are whole foods in their natural state, such as fruits, vegetables, and nuts. They may be subject to minimal processing, like freezing, drying and crushing, but these actions do not alter the product's nutrients. No salt, sugar or other substances are added.
2. **Processed culinary ingredients (NOVA group 2)** are products obtained from unprocessed foods via industrial processes such as pressing, refining, or centrifuging. Examples include oils, salt, and sugar —products which are used to prepare and cook other foods.
3. **Processed foods (NOVA group 3)** are industrial products made by combining ingredients from group 2 with foods from group 1. This processing serves two purposes: to **enhance the conservation** of the products via methods such as bottling and canning and to **enhance the taste**. Examples include artisanal bread, cheese, wine, beer, and canned vegetables and meat.
4. **Ultra-processed foods (NOVA group 4)** are foods that undergo a series of industrial processes,¹⁰ including soft drinks, sausages, packaged snacks, and pre-prepared pies. Many of those processes involve chemical modification of certain substances, industrial techniques that use flavours, emulsifiers, and other additives, and/or a large use of sugars, fats, and salt. A simplified definition of UPFs is **foods with more than one ingredient not usually found in a domestic kitchen**.¹¹



Increasing level of processing

The negative health impact of UPFs

Although processing has always been part of our food history, advancements in technology and the food industry have only led to the creation of UPFs in the last few decades.

Rates of overweight and obesity are among the leading causes of disability and death in Europe, and rates continue to rise.¹² Research indicates that the increasing consumption of UPFs is a key driver of obesity.¹³ UPFs damage people's health in several other ways too:

- High energy-dense products contain a lot of sugar, salt, and unhealthy fats while **lacking important nutrients**, such as fibre, vitamins, proteins, and minerals.^{14,15}
- They have **low satiety potential**, induce **high glycaemic responses**,¹⁶ and increase the likelihood of developing **inflammatory diseases**¹⁷ and **gastrointestinal disorders**.¹⁸
- UPFs increase the risk of **several cancers**, namely colorectal, breast, pancreatic, chronic lymphocytic leukaemia, and central nervous system tumours.¹⁹
- They heighten the risk of **coronary diseases**,²⁰ **hypertension**,²¹ **metabolic syndrome**, **non-alcoholic fatty liver disease**,²² and **dyslipidaemia**.²³
- There's growing evidence of the link between UPF consumption and **depression**, **anxiety disorders**, and **other mental disorders**.²⁴

While the research is clear, the food industry is purposefully trying to create confusion about UPFs' negative health impacts.^{25,26}

The 2024 World Health Organization (WHO) report on the commercial determinants of health²⁷ shows that industries' strategies are a significant factor in the increase of UPF consumption. Big agri-food industries prioritise profit, making UPFs prevalent in the food market, even at the expense of people's health.

Local, national, and EU policies urgently need to reverse the trend in Europe's widely increasing consumption rate of UPFs.

EU policies targeting UPF consumption

Several European Union (EU) policies aim to improve the food system, directly or indirectly reducing the consumption of UPFs in favour of healthier alternatives.

- The [Farm to Fork strategy](#)²⁸, at the heart of the [European Green Deal](#),²⁹ aimed to make the European food systems more just, healthy, and environmentally friendly. The strategy would have targeted UPFs by reformulating food products to reduce unhealthy ingredients like salt, sugar, and saturated fats (HFSS) and introducing a transparent and uniform front-of-pack nutrition labelling (FOPNL) to help consumers make informed choices. However, by 2025, almost all policies foreseen by the Farm2Fork strategy have been paused or dismissed.³⁰
- The [EU School Fruit, Vegetables, and Milk Scheme's](#)³¹ distributes fresh fruits, vegetables, and milk to schools, combined with educational measures to promote healthy eating habits and reduce the consumption of UPFs among children.
- The [EU Regulation on the provision of food information to consumers](#) (FIC)³² mandates detailed nutritional information on pre-packaged foods, including energy value and amounts of fat, saturates, carbohydrates, sugars, protein, and salt. Its goal is to enhance consumer awareness about the nutritional

content of food products, fostering consumption of healthy foods, while reducing that of UPFs.

- Eight European countries³³ have implemented —on top of the FIC—the **FOPNL Nutri-Score**, a system that helps consumers identify UPFs containing unhealthy ingredients.³⁴
- Several countries worldwide use **fiscal policies** to reduce consumption of UPFs and HFSS foods. Tax designs vary in what they target (density, volume, base price), tax level, and other factors.³⁵ For example, several European countries tax sugar-sweetened beverages according to their sugar content as a measure to reduce their consumption.³⁶



- The [Joint Action Best-ReMaP - Healthy food for a healthy future \(2020-2023\)](#) involved 24 EU Member States and focused on the monitoring and analysis of food reformulation, regulations on marketing of food and beverages to children, and food procurement by public bodies. It identified policy actions needed to target unhealthy food consumption in these three domains.³⁷ The [Joint Action PreventNCD \(2024-2027\)](#) contributes to reducing non-communicable diseases (NCDs) such as cancer by supporting strategies and policies that encourage healthier food choices. Both Joint Actions have advanced scientific evidence on the health benefits of reducing UPF consumption while also offering policy solutions.

The EU has taken some action to improve its food system and reduce the consumption of UPFs. However, more needs to be done, especially given the failure of the Farm to Fork strategy.



Making it happen

United Kingdom

The 2018 Soft Drinks Industry Levy (sugar tax) encourages manufacturers to reformulate their products. This levy **targets all drinks with sugar added during production** or anything that contains sugar, such as honey.³⁸ The Levy is 18 pence/litre for drinks with 5-7g of sugar per 100ml, and 24 pence/litre for drinks with over 8 grams per 100ml. Studies show it has helped remove more than 45,000 tonnes of sugar from soft drinks per year since its introduction while generating more than £334m.³⁹ In turn, this has led to promising public health results, such as a decreased prevalence of obesity in children, especially those living in the most deprived areas.⁴⁰

Slovenia

Slovenia has implemented several successful initiatives concerning **public food procurement in schools**. Nutritional guidelines for educational institutions aim to reduce UPF and HFSS food consumption while incentivising healthier foods like fruits, vegetables, and whole grains. Specific financial support ensures that products are locally sourced, seasonal, and, when possible, organic. An example is the 'Traditional Slovenian Breakfast',⁴¹ where students learn about local production of food and nutrition. These initiatives have created a healthier food environment in schools⁴² whilst benefiting the local food economy, children's health literacy, and overall health.⁴³

FEAST

EuroHealthNet is part of the Horizon-funded European project [FEAST](#).⁴⁴ The project aims to make it easy for everyone in Europe to enjoy a **delicious, healthier, and more sustainable diet** by bringing together diverse research fields. This approach will help create practical solutions for communities, technology, and policy at all levels (micro, meso and macro) and in all sectors (producers, distributors, retailers and consumers) of the food system. FEAST prioritises fairness by ensuring that vulnerable groups and those facing health inequalities benefit from healthier, sustainable diets.

Pathways to progress

There is no silver bullet capable of resolving the overconsumption of UPFs. Additional actions must be taken at the local, national, and EU levels to ensure a systemic approach and create healthier food systems. Key actions include:

- Mandatory and uniform front-of-pack nutrition labelling (FOPNL) across the EU:** EU institutions ought to take up the EU-wide standardisation of Nutri-Score as an essential step for public health. This system, in addition to the current FIC, guides consumers towards healthier products. 'Nutri-Score V.2.0' includes a black 'ultra-processed banner' to help individuals better detect ultra-processed products. While not yet adopted,



the label has been **successfully tested and provides further evidence** why the Nutri-Score should be implemented as a **mandatory and uniform FOPNL across Europe**.⁴⁵

- Reformulation of food and beverage products** is the process of altering the processing or composition of a product to improve its nutritional profile or to reduce its content of sugar, salt, and saturated fats. Fiscal policies are one way to encourage producers to reformulate products. Other ways are reducing portion sizes, banning, entirely or partially, certain ingredients such as trans fatty acids, and/or setting upper limits on the content of sugar, fats, and salt.⁴⁶ Several countries have already taken action in this regard.⁴⁷ If more countries followed WHO guidelines,⁴⁸ manufacturers would be required to reformulate their products.⁴⁹

- **Marketing and advertising restrictions:** Industries invest large amounts of money to market UPFs.⁵⁰ To reduce consumption, strict policy restrictions are necessary for both offline and online marketing. The STOP project⁵¹ on childhood obesity and a WHO policy brief on protecting children from food marketing⁵² emphasise that a comprehensive policy approach can lead to positive health outcomes.
- **Make the healthy choice more accessible:** UPFs are convenient as they are shelf-stable, ready-to-eat, widely available, and often cheaper than less processed or unprocessed food. Reducing UPF consumption requires reducing their availability⁵³ and subsidising healthier alternatives.⁵⁴ Several countries in the EU are considering **reducing or eliminating VAT** on healthy products such as fruit and vegetables to make them cheaper and more accessible.
- **High-quality public food procurement:** Public procurement is important in ensuring healthy diets, especially for school children, and can reduce health inequalities.⁵⁵ In public settings, food is too often selected by price criteria only, neglecting the health component. Public procurement policies should focus on providing quality food that is not ultra-processed to favour equitable and sustainable sourcing from local producers. The [Joint Action Best-ReMaP](#) identified actions for local, national and European authorities to progress on public food procurement.⁵⁶
- **Tackle food deserts:** We must improve food environments within public bodies such as schools, as well as surrounding areas, and **in all rural and urban settings**. We must avoid creating ‘food deserts’ that make it difficult for people to buy affordable, good-quality fresh food.⁵⁷ EuroHealthNet advocates to allow public health-based exemptions to the European Services Directive,⁵⁸ which would give local authorities the legal instruments to ban fast-food companies from settling in local areas.
- **Shifting decisional power from commercial actors to citizens:** Food democracy empowers citizens to actively improve their food environments. Examples of implementation are increasing, especially at the local level.⁵⁹ They include hackathons,⁶⁰ citizen tribunals,⁶¹ and cooperative movements in food systems. For example, in the Morgenrot co-operative in Austria,⁶² all key stakeholders in the regional food system are engaged to ensure sustainable food and access to healthier products.
- **Mandatory regulations instead of self-regulatory frameworks:** Finally, for all the policies mentioned, it is crucial to avoid corporate lobbying efforts that water down key actions and mandatory regulations to favour, instead, codes of conduct and self-regulatory and voluntary approaches. These have proven to lead to very limited results.⁶³

Addressing Europe’s overweight and obesity epidemic requires reversing the rising trend in UPF consumption. The current (over-)consumption is caused by a food system that prioritises convenience and profit over public health. Policies and actions must focus on the entire food system, regulating it rather than telling individuals ‘how best to survive an unhealthy system’.

Human health is a fundamental right, and access to healthy food is essential for healthy living. It is crucial that the European Vision for Agriculture and Food of the European Commission 2024-2029 mandate fully addresses commercial determinants of health and the harm caused by UPFs.



Learn about health inequalities and how to address them at www.health-inequalities.eu.

EuroHealthNet is a partnership of public organisations, institutes, and authorities working on public health, disease prevention, promoting health and wellbeing, and reducing inequalities. We aim to tackle health inequalities within and between European States through action on the social determinants of health. For further information and references visit our website.



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