

**European Commission's Group of Chief Scientific Advisors and
European Group on Ethics in Science and New Technologies**

SCOPING PAPER

Scientific and Ethical Assessment of Ultra-processed Food Consumption and Recommendations for Related Policies in the EU

July 2026

1. The issue at stake

In 2009, researchers from the University of São Paulo, Brazil coined the term ‘ultra-processed food’ (UPF).¹ They developed a classification termed Nova, which sorts food and drinks into four categories: (1) un- or minimally processed foods, (2) processed culinary ingredients, (3) processed foods (products that mix un- or minimally processed foods and culinary ingredients), and (4) ultra-processed foods (products that mostly contain little to no whole food). While Nova has now been updated several times, and many other classification systems have been proposed (often variants of Nova), Nova has been increasingly used in epidemiological research. A criticism voiced frequently regarding the Nova classification is however that its criteria lack the degree of precision required to categorise individual food items consistently, without subjective interpretation.²

Some observational studies have linked the consumption of UPF to adverse health effect, and to a decrease in nutrient-dense diets^{2 3 4}. In general, unhealthy diets represent a primary driver of the global burden of disease, contributing to an estimated 11 million annual deaths from non-communicable diseases such as cardiovascular disease, cancer, and type 2 diabetes^{5 6}. In continental Europe, an estimated USD 407.16 billion in annual health costs are attributable to poor diets⁷. As diet is one of the main controllable drivers of health, the contribution of UPF to unhealthy diets, and potential policy actions, should be investigated.

A large body of research suggests that diets rich in UPF specifically are often associated with negative health effects – in particular with an increased risk of overweight and obesity⁸ and non-

¹ Monteiro, C. A. (2009). Nutrition and health. The issue is not food, nor nutrients, so much as processing. *Public Health Nutrition*, 12(5), 729–731. <https://doi.org/10.1017/S1368980009005291>

² Vadeloo, M. K., Gardner, C. D., Bleich, S. N., Khandpur, N., Lichtenstein, A. H., Otten, J. J., Rebholz, C. M., Singleton, C. R., Vos, M. B., & Wang, S. (2025). Ultraprocessed Foods and Their Association With Cardiometabolic Health: Evidence, Gaps, and Opportunities: A Science Advisory From the American Heart Association. *Circulation*, (February). <https://doi.org/10.1161/CIR.0000000000001365>

³ Lane, M. M., Gamage, E., Du, S., Ashtree, D. N., McGuinness, A. J., Gauci, S., Baker, P., Lawrence, M., Rebholz, C. M., Srouf, B., Touvier, M., Jacka, F. N., O’Neil, A., Segasby, T., & Marx, W. (2024). Ultra-processed food exposure and adverse health outcomes: Umbrella review of epidemiological meta-analyses. *The BMJ*, 384, e077310. <https://doi.org/10.1136/BMJ-2023-077310>

⁴ Monteiro, C. A., Louzada, M. L., Steele-Martinez, E., Cannon, G., Andrade, G. C., Baker, P., Bes-Rastrollo, M., Bonaccio, M., Gearhardt, A. N., Khandpur, N., Kolby, M., Levy, R. B., Machado, P. P., Moubarac, J.-C., Rezende, L. F. M., Rivera, J. A., Scrinis, G., Srouf, B., Swinburn, B., & Touvier, M. (2025). Ultra-processed foods and human health: The main thesis and the evidence. *The Lancet*, 406(10520), 2667–2684. [https://doi.org/10.1016/S0140-6736\(25\)01565-X](https://doi.org/10.1016/S0140-6736(25)01565-X)

⁵ Elizabeth, L., Machado, P., Zinöcker, M., Baker, P., & Lawrence, M. (2020). Ultra-Processed Foods and Health Outcomes: A Narrative Review. *Nutrients* 2020, Vol. 12, Page 1955, 12(7), 1955. <https://doi.org/10.3390/NU12071955>

⁶ Barbaresco, J., Bröder, J., Conrad, J., Szczerba, E., Lang, A., & Schlesinger, S. (2025). Ultra-processed food consumption and human health: An umbrella review of systematic reviews with meta-analyses. *Critical Reviews in Food Science and Nutrition*, 65(11), 1999–2007. <https://doi.org/10.1080/10408398.2024.2317877>

⁷ Seidel, F., Oebel, B., Stein, L., Kleemann, S., & Gaugler, T. (2026). Determining the Global Economic Burden of External Health Effects of Food Consumption in 204 Countries and Territories. *Nutrients*, 18(3), 426. <https://doi.org/10.3390/nu18030426>

⁸ Juul, F., Martinez-Steele, E., Parekh, N., & Monteiro, C. A. (2025). The role of ultra-processed food in obesity. *Nature Reviews Endocrinology*, 21(11), 672–685. <https://doi.org/10.1038/s41574-025-01143-7>

communicable diseases⁹. Other observational evidence points to negative mental health effects (e.g., anxiety, depression)^{6 10}.

The share of UPF (as a percentage of total energy intake and as defined by Nova) in European diets varies considerably. It remains below 25 % in some countries in southern Europe (e.g., Italy, Cyprus, Greece, and Portugal) but exceeds 35 % in the Netherlands and Germany, reaching 40 % in other Member States such as Sweden.⁴ In addition, the percentage of the total amount of energy consumed that is derived from UPF seems to be increasing: in Spain, for example, it tripled from 1990 to 2010 (11 % to 32 %).⁴ UPF sales have generally stayed high in high-income countries since 2007 at approximately 200 kg per person per year.⁴

The production of these UPF generally relies on cheap commodity crops (such as maize, soy, and wheat), which allows for lower food prices and higher profitability, but may also have implications for biodiversity and the environment^{11 12 13}. Indeed, while UPF are widely discussed in relation to diet-related noncommunicable diseases, it should also be borne in mind that their production, composition, distribution and consumption are embedded in broader societal systems that intersect with multiple domains of public policy beyond health^{12 14 15 16}. These include agriculture, food safety, industry, trade, consumer protection, social justice, culture, environmental sustainability (including resource use, packaging, and food and packaging waste), animal welfare, and biodiversity.¹⁷

Regarding social justice and the links between socioeconomic status and UPF consumption, a recent review noted that higher UPF consumption ‘is more prominent among families with lower socioeconomic status, who are characterized by increasing prevalence of obesity’, and that ‘lower parental socioeconomic status as well as lower parental educational level have

⁹ “Meta-analyses of prospective studies show associations between the ultra-processed dietary pattern and an increased risk of overweight or obesity, abdominal obesity, type 2 diabetes, hypertension, dyslipidaemia, cardiovascular disease or mortality, coronary heart disease or mortality, cerebrovascular disease or mortality, chronic kidney disease, Crohn’s disease, depression, and all-cause mortality.” Monteiro, Carlos A., Maria LC Louzada, Euridice Steele-Martinez, et al. “Ultra-Processed Foods and Human Health: The Main Thesis and the Evidence.” *The Lancet* 406, no. 10520 (2025): 2667–84. [https://doi.org/10.1016/S0140-6736\(25\)01565-X](https://doi.org/10.1016/S0140-6736(25)01565-X).

¹⁰ Lutz, M., Arancibia, M., Moran-Kneer, J., & Manterola, M. (2025). Ultraprocessed Foods and Neuropsychiatric Outcomes: Putative Mechanisms. *Nutrients*, 17(7), 1215. <https://doi.org/10.3390/nu17071215>

¹¹ Godsey, T. J., Eden, T., & Emerson, S. R. (2025). Ultra-Processed Foods and Metabolic Dysfunction: A Narrative Review of Dietary Processing, Behavioral Drivers and Chronic Disease Risk. *Metabolites*, 15(12), 784. <https://doi.org/10.3390/metabo15120784>

¹² Leite, F. H. M., Khandpur, N., Andrade, G. C., Anastasiou, K., Baker, P., Lawrence, M., & Monteiro, C. A. (2022). Ultra-processed foods should be central to global food systems dialogue and action on biodiversity. *BMJ Global Health*, 7(3). <https://doi.org/10.1136/bmjgh-2021-008269>

¹³ European Environment Agency. European Scientific Advisory Board on Climate Change. (2026). Climate adaptation and mitigation in the agri-food system. Publications Office of the European Union. <https://doi.org/10.2800/3706315>

¹⁴ Ralston, R., Sievert, K., Anastasiou, K., Yates, J., & Clapp, J. (2026). Ultra-processed foods are a key driver of the global plastics pollution crisis. *Nature Food*, 7(4), 309–311. <https://doi.org/10.1038/s43016-026-01341-0>

¹⁵ Ullian, K., Espinosa, S. N., Huse, O., Cummins, S., Medina-Lara, A., & Cornelsen, L. (2026). Beyond diet and health: Scoping umbrella review of the wider impact and influence of ultra-processed foods. *BMC Public Health*, 26(1), 209. <https://doi.org/10.1186/s12889-025-26113-6>

¹⁶ Fardet, A., & Rock, E. (2020). Ultra-Processed Foods and Food System Sustainability: What Are the Links? *Sustainability*, 12(15), 6280. <https://doi.org/10.3390/su12156280>

¹⁷ For broader discussions on food systems and the intersections of multiple domains of policy, see also the previous work of the Scientific Advice Mechanism on sustainable food systems (2020), sustainable food consumption (2023), and One Health governance (2024) and their corresponding SAPEA evidence review reports.

been correlated to a higher intake of UPF'.¹⁸ Another review noted that 'food insecurity has been associated with a 21–56 % greater risk of meeting criteria for UPF addiction' and 'persons with lower household incomes are more likely to have obesity if they meet criteria for UPF addiction'.¹⁹

Consumers seem to be somewhat aware of these issues, and recent European consumer surveys highlight growing concerns among consumers^{20 21 22}. In one survey, more than half of the respondents 'believe that ultra-processed foods are unhealthy', 'will cause health issues', and 'consider ultra-processed foods to be bad for the environment'.²¹ Some 40 % 'do not trust that ultra-processed foods are regulated well enough by authorities to ensure these foods are safe and healthy in the long term'.²¹ In another survey²⁰, respondents most often identified consuming less sugars, less fat and less ultra-processed foods as ways to improve diets. Past work of the Scientific Advice Mechanism on diets showed that purchasing decisions are strongly shaped by marketing, advertising, and the wider food environment, which can limit informed and autonomous consumer choices^{23 24}, which may be an issue for UPF in particular^{2 10 25 26}.

Food processing is an integral part of our food systems. It can ensure microbiological safety, removing toxins and extending shelf life, and can increase taste and bioavailability of nutrients through methods such as heating, drying, pasteurising, fermenting, and milling.

Advances in food science and technology have enabled the food industry to develop new processing techniques (such as high-heat extrusion, moulding, hydrolysis and oil hydrogenation) that allow for faster, cheaper, more homogenous, and more shelf-stable

¹⁸ Vallianou, N. G., Kounatidis, D., Tzivaki, I., Zafeiri, G. C. M., Rigatou, A., Daskalopoulou, S., Stratigou, T., Karampela, I., & Dalamaga, M. (2025). Ultra-Processed Foods and Childhood Obesity: Current evidence and perspectives. *Current Nutrition Reports*, 14(1), 5. <https://doi.org/10.1007/s13668-024-00596-y>.

¹⁹ LaFata, E. M., Allison, K. C., Audrain-McGovern, J., & Forman, E. M. (2024). Ultra-Processed Food Addiction: A Research Update. *Current Obesity Reports*, 13(2), 214–223. <https://doi.org/10.1007/S13679-024-00569-W/TABLES/1>

²⁰ European Food Safety Authority. Food Safety in the EU: Eurobarometer Report. Publications Office, 2025. <https://doi.org/10.2805/7315555>.

²¹ <https://www.eitfood.eu/news/consumers-fear-health-risks-of-ultra-processed-foods>

²² <https://www.eitfood.eu/reports/trust-report-2026-first-issue>

²³ Group of Chief Scientific Advisors (European Commission) & Directorate-General for Research and Innovation (European Commission). (2020). Towards a Sustainable Food System: Moving from food as a commodity to food as more of a common good : independent expert report. Publications Office of the European Union. <https://data.europa.eu/doi/10.2777/282386>

²⁴ Group of Chief Scientific Advisors (European Commission) & Directorate-General for Research and Innovation (European Commission). (2023). Towards sustainable food consumption: Promoting healthy, affordable and sustainable food consumption choices. Publications Office. <https://doi.org/10.2777/29369>

²⁵ Smith, R., Kelly, B., Yeatman, H., & Boyland, E. (2019). Food Marketing Influences Children's Attitudes, Preferences and Consumption: A Systematic Critical Review. *Nutrients*, 11(4), 875. <https://doi.org/10.3390/nu11040875>

²⁶ Lafontaine, J., Hanson, I., & Wild, C. (2025). The impact of the social media industry as a commercial determinant of health on the digital food environment for children and adolescents: A scoping review. *BMJ Global Health*, 10(2). <https://doi.org/10.1136/bmjgh-2023-014667>

production^{27 28 29}. These processing techniques allow the deconstruction of cellular structures of whole foods, and the reconstruction of entirely new foods with acellular nutrient formulations to further increase profitability, convenience (e.g. through ready-to-heat and ready-to-eat meals), and shelf-stability. They can also modify sensory characteristics like flavour and visual appeal. Furthermore, food processing may also benefit public health, helping address dietary inadequacies through nutrient fortification when implemented in line with national nutrition policies (e.g., with iodine). And they may contribute to reducing global food waste, costs, and domestic labour burdens. Yet, these technologies may also bring new burdens to human, animal and planetary health (see below).

The question of whether and how regulation can reduce the health impacts related to UPF consumption has become more prominent globally. In May 2025, the World Health Organization (WHO) launched a call for experts to develop a WHO guideline for policymakers on consumption of ultra-processed foods³⁰ and published a preliminary list of working group members in November³¹. Also in November 2025, the academic journal *The Lancet* published a special series on ultra-processed foods and human health with a strong call for (regulatory) action.³² The United Nations Children's Fund (UNICEF) published a report on children and UPF in 2025 (building on the *Lancet* special series) that includes policy recommendations.³³ The July 2026 issue of the academic *American Journal of Public Health* features a special section on UPF and public health.³⁴

Producing a scientific understanding and defining and managing the ethical considerations of such a complex, multifaceted issue is challenging. It is an evolving field, with a growing body of evidence about the health effects of UPF consumption continuously becoming available³⁵. Environmental and social impacts of UPF currently seem to be less well understood¹⁵. Consequently, there is a need for an evaluation of the evidence, as also indicated in the *Vision on Agriculture and Food*³⁶ and the *Safe Hearts Plan*³⁷ (see below).

In the light of the above, the Group of Chief Scientific Advisors (GCSA) and the European Group on Ethics in Science and New Technologies (EGE) are asked to provide Opinions on

²⁷ Juul, F., & Bere, E. (2024). Ultra-processed foods – a scoping review for Nordic Nutrition Recommendations 2023. *Food & Nutrition Research*, 68. <https://doi.org/10.29219/FNR.V68.10616>

²⁸ Vadiveloo, M. K., Gardner, C. D., Bleich, S. N., Khandpur, N., Lichtenstein, A. H., Otten, J. J., Rebholz, C. M., Singleton, C. R., Vos, M. B., & Wang, S. (2025). Ultraprocessed Foods and Their Association With Cardiometabolic Health: Evidence, Gaps, and Opportunities: A Science Advisory From the American Heart Association. *Circulation*, (February). <https://doi.org/10.1161/CIR.0000000000001365>

²⁹ Godsey, T. J., Eden, T., & Emerson, S. R. (2025). Ultra-Processed Foods and Metabolic Dysfunction: A Narrative Review of Dietary Processing, Behavioral Drivers and Chronic Disease Risk. *Metabolites*, 15(12), 784. <https://doi.org/10.3390/metabo15120784>

³⁰ <https://www.who.int/news-room/articles-detail/call-for-experts-to-develop-a-who-guideline-on-consumption-of-ultra-processed-foods>

³¹ <https://www.who.int/news-room/articles-detail/public-notice-and-comment-who-guideline-development-group-for-ultra-processed-foods>

³² <https://www.thelancet.com/series-do/ultra-processed-food>

³³ United Nations Children's Fund (UNICEF). (2025). *Ultra-processed Foods and Children. State-of-the-art review*. UNICEF. New York.

³⁴ <https://ajph.aphapublications.org/ultraprocessedfoodssection>

³⁵ Touvier, M. (2026). Health effects of ultra-processed food: Uncovering causal mechanisms. *Nature Reviews Endocrinology*, 22(2), 66–67. <https://doi.org/10.1038/s41574-025-01218-5>

³⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52025DC0075>

³⁷ https://health.ec.europa.eu/publications/communication-eu-cardiovascular-health-plan-safe-hearts-plan_en

the topic of so-called ‘ultra-processed food’ within the policy context and as per the questions described below.

2. EU policy background

The European Union and its Member States have a broad and complex range of policies relating to food, in areas like food safety (including on food additives and contamination), food production and security, information to consumers and consumer protection, public health, research and innovation funding, and sustainability. These policies aim to support safe, healthy and fair food environments, and a competitive food industry in the EU. Based on the subsidiarity principle, many of these policy areas are Member States’ and regions’ prerogatives (including tax policies, e.g., value added tax), where the EU only supports and/or makes recommendations.

There is currently no specific legislation in place that explicitly addresses UPF at EU or Member State level. However, the European Commission’s Communication on a Vision for Agriculture and Food (COM/2025/75)³⁶ – presented in 2025 – specifically mentions that the Commission will conduct a study aiming to look at the ‘impact of the consumption of [...] so-called “ultra-processed foods”’ in view of its annual Food Dialogues with stakeholders (that includes consumers, primary producers, industry, retailers, public authorities and civil society).

The subsequent Commission Communication on a Strategy for European Life Sciences (COM/2025/525)³⁸ notes that ‘a lack of clear information about the risks and benefits of the so-called “ultra-processed foods” can create uncertainty for consumers’ and presents the intention to ‘seek scientific and ethical advice on so-called “ultra-processed foods” from the Scientific Advice Mechanism and the European Group on Ethics in Science and New Technologies’.

The Communication from December 2025 on an EU cardiovascular health plan: the Safe Hearts Plan (COM/2025/1024)³⁷ mentions that the possible links between unhealthy diets, UPF consumption and the increase in non-communicable diseases make it necessary to provide clear information to consumers about their available nutrition choices, with a view to helping them choose healthier food options. The Communication notes that ‘children and young people are particularly vulnerable to marketing of so-called “ultra-processed” foods and foods high in fat, sugar, and salt’, and it proposes an evaluation and potential revision of the Audiovisual Media Service Directive (see below), which includes rules to protect minors from harmful content.

The Communication presents two related flagship initiatives: **flagship 2** ‘empowering consumers through information on food processing in the EU’, through which the Commission will work towards ‘a new comprehensive food processing assessment system [...] to empower consumers with transparent, accessible, science-based digital information on food processing with the aim to ultimately encourage shifts towards healthier diets’, and **flagship 4** through which the Commission will examine ‘appropriate tools, including possible financial actions [...] to support/fund public health actions on prevention and stimulate food reformulation and healthier consumer food choices’. For flagship 4, it is explicitly stated that it will be based on the work of the SAM and the EGE.

³⁸ https://research-and-innovation.ec.europa.eu/strategy/strategy-research-and-innovation/jobs-and-economy/strategy-european-life-sciences_en

The following summary aims to highlight the most important EU policies for addressing issues related to UPF.

General Food Law and food safety

One crucial existing element of EU food policy is the General Food Law (Regulation (EC) No 178/2002). It sets out a comprehensive harmonised legal framework that provides the basis for developing both EU and national food law. It covers the entire food chain, i.e. all stages of production, processing and distribution of food and feed. The General Food Law also establishes the European Food Safety Authority (EFSA), tasked with providing scientific advice related to the risks from substances used in the production or contained in food.

Furthermore, the General Food Law establishes certain general principles and approaches to underpin all subsequent EU and national food law. It states that – in order to achieve the general objective of a high level of protection of human health and life – risk management measures can take different forms, varying from information campaigns to bans and withdrawals of products from the market. When, however, provisional measures are taken based on the precautionary principle, these must be proportionate and must be reviewed as soon as new scientific evidence becomes available.

Beyond the General Food Law, there are complementing policies and legislation that ensure further consumer protection. Regulation (EC) No 1331/2008, for example, establishes the common authorisation procedure for food additives, food enzymes and food flavourings. Regulation (EC) No 1333/2008 defines food additives as ‘any substance not normally consumed as a food in itself and not normally used as a characteristic ingredient of food [...] the intentional addition of which to food for a technological purpose in the manufacture, processing, preparation, treatment, packaging, transport or storage of such food results, or may be reasonably expected to result, in it or its by-products becoming directly or indirectly a component of such foods’; the technological purpose can be, for example, the preservation of food. Regulation No 1334/2008 lays down general requirements for safe use of food flavourings. Additives include preservatives, colorants, and emulsifiers.

Currently over 300 additives are authorised in the EU following EFSA’s safety assessment. These authorisations do not expire, but the Commission may mandate a re-evaluation in the light of changing conditions of use and new scientific evidence. Regulation (EU) No 257/2010 mandated a re-evaluation of all additives approved prior to 20 January 2009, for which EFSA takes into account any relevant new scientific and technical information; this review is still ongoing (so far, EFSA re-evaluated more than 70% of the 315 food additives).

Regulations on food contact materials (FCM) are another component of food safety legislation: Regulation (EC) No 1935/2004, the basic act, requires that FCM do not transfer their constituents onto food at levels that could endanger human health. Regulation (EC) No 2023/2006 sets out rules on good manufacturing practices for FCM. Specific legislation on materials such as Regulation (EU) No 10/2011 sets out rules on the composition of plastic FCMs and establishes a Union List of substances that are permitted for use in the manufacture of plastic FCMs. It is complemented by Regulation (EU) 2022/1616 on recycled plastics.

Food safety is further ensured through the basic principles of EU legislation on contaminants in food laid down in Council Regulation 315/93/EEC. It states, for example, that food containing a contaminant to an amount unacceptable from the public health viewpoint shall not be placed on the market. Subsequent regulations establish specific criteria and acceptable levels of specific contaminants.

Public health

EU policies supporting public health aim at improving health and preventing diseases. The EU4Health programme (established by Regulation (EU) 2021/522) is the dedicated funding programme for 2021-2027³⁹. It aims to, among others, strengthen healthcare systems, promote innovation in the health sector, promote good human health, and improve disease prevention – including the diagnosis and treatment of communicable and non-communicable diseases, in particular cancer.

EU4Health also funds Europe's Beating Cancer Plan⁴⁰, which includes an initiative aimed at reducing 'the presence of carcinogenic contaminants in food' by setting maximum level limits for additional contaminants. Its many actions include improving cancer prevention by making healthy foods more available, improving consumer information and health literacy, and addressing the marketing and advertising of products linked to cancer risks.

In 2022, the EU launched the 'Healthier together' initiative against non-communicable diseases⁴¹. It aims to support EU countries in identifying and implementing effective policies and actions to reduce the burden of major non-communicable diseases and improve citizens' health and wellbeing, including through lifestyle and dietary changes.

Since 2008, EU reformulation frameworks were agreed with Member States to contribute towards achieving population intake levels and dietary patterns in line with national, European Food Safety Authority and World Health Organization (WHO) recommendations.⁴²

Consumer protection and information

Other EU policies relevant for prevention include the Audiovisual Media Services Directive (AVMSD; 2010/13/EU), which encourages 'media service providers to develop codes of conduct regarding inappropriate audiovisual commercial communications, accompanying or included in children's programmes, of foods and beverages containing nutrients and substances with a nutritional or physiological effect, [...] excessive intakes of which in the overall diet are not recommended'.

More generally, Regulation (EC) No 1169/2011 on the provision of food information to consumers (FIC) establishes the general principles, requirements and responsibilities governing food information (including advertising, ingredients list, food origins, and in particular food labelling). It considers the differences in the perception of consumers and their information needs, while ensuring the smooth functioning of the internal market.

³⁹ https://health.ec.europa.eu/funding/eu4health-programme-2021-2027-vision-healthier-european-union_en

⁴⁰ https://commission.europa.eu/topics/public-health/european-health-union/cancer-plan-europe_en

⁴¹ https://health.ec.europa.eu/non-communicable-diseases/healthier-together-eu-non-communicable-diseases-initiative_en

⁴² https://ec.europa.eu/health/archive/ph_determinants/life_style/nutrition/documents/salt_initiative.pdf
https://health.ec.europa.eu/publications/eu-framework-national-initiatives-selected-nutrients_en
https://health.ec.europa.eu/publications/saturated-fat-eu-framework-national-initiatives-selected-nutrients_en
https://health.ec.europa.eu/publications/added-sugars-annex-eu-framework-national-initiatives-selected-nutrients_en

In 2026 the Commission also launched a public information campaign about the EU's food-safety rules (publishing factsheets on, e.g., food additives, contaminants, labelling, and safe packaging).⁴³

Food production and availability

As regards the production of healthy food, at EU level, the Common Agricultural Policy (CAP) is one of the EU's most significant policies in terms of budgetary expenditures, and it impacts the production, quality and sustainability of agricultural commodities and raw material inputs into the food chain in the EU. The CAP also aims to ensure that consumers have access to affordable food while supporting the income of farmers. One of its strategic objectives is to improve the response of EU agriculture to societal demands on food and health, including the provision of high-quality, safe and nutritious food produced in a sustainable way. The 2025 Vision on Agriculture and Food proposes a prioritisation of CAP support for 'production of agricultural products which are essential for the EU's strategic autonomy and resilience'³⁶.

The Communication on an EU strategy on the rights of the child (COM/2021/142) and the European child guarantee⁴⁴ from 2021 provide a comprehensive EU Strategy to ensure the protection of rights of all children, and secure access to basic services for vulnerable children. This includes the goal that EU Member States should guarantee effective access of children in need to healthy nutrition. The Strategy explicitly notes that 'during the past 30 to 40 years, the increased availability and affordability of ultra-processed, unhealthy foods led to escalating overweight and obesity'. Globally, the Strategy calls 'for food systems to deliver nutritious, safe, affordable, and sustainable diets that meet the needs and rights of children'. Internationally, the EU recognises that 'every child has the right to proper nutrition' and promotes 'good nutrition, healthy diets, and food security'.⁴⁵

Within the EU, Regulation (EU) No 1308/2013 on 'establishing a common organisation of the markets in agricultural products' provides for the EU school scheme⁴⁶. It aims to support viable food production and promote healthy eating habits among children by encouraging the distribution and consumption of fruit and vegetables, milk and certain milk products in schools. It also supports educational measures (lessons, farm visits, school gardens, tasting and cooking workshops) that inspire and inform students about healthy eating habits. In 2025, the Commission tabled a proposal for a revised Council Regulation on this aid scheme.⁴⁷

Lastly, an EU code of conduct on responsible food business and marketing practices (the 'Agri-Food Code') was drawn up in 2021 by the signatories in consultation with the Commission as part of the European Green Deal and the Commission's Farm to Fork strategy. It aims, among others, to promote sustainable and ethical practices across the food sector. This includes to improve food consumption patterns via improving the nutritional composition of food products/meals through product reformulation, while taking into account, where appropriate, food-based dietary guidelines and other relevant policies.

⁴³ https://food.ec.europa.eu/food-safety/campaign-2026/campaign-overview_en

⁴⁴ https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/rights-child/eu-strategy-rights-child-and-european-child-guarantee_en

⁴⁵ https://international-partnerships.ec.europa.eu/policies/climate-environment-and-energy/nutrition-and-food-security_en

⁴⁶ https://agriculture.ec.europa.eu/common-agricultural-policy/market-measures/school-scheme-explained_en

⁴⁷ https://commission.europa.eu/publications/school-fruit-vegetables-and-milk-scheme-eu-school-scheme_en

Environment and waste

As regards sustainability and environmental impacts of and on food, the European Commission adopted the new circular economy action plan (CEAP; COM/98/2020) in March 2020 to reduce pressure on natural resources. It is also a prerequisite to achieve the EU's 2050 climate neutrality target and to halt biodiversity loss. On food, specifically, the plan proposes to set targets on food waste reduction (regulated by Commission Delegated Decision (EU) 2019/1597), consider specific measures to increase the sustainability of food distribution and consumption, and establish rules for the safe recycling into plastic food contact materials.

On food waste, the 2025 amendment of the Waste Framework Directive ((EU) 2025/1892) introduced binding food waste reduction targets for Member States to achieve by 2030: -10 % in processing and manufacturing, and -30 % (per capita) jointly at retail and consumption (restaurants, food services and households).

As regards packaging waste, the Packaging and Packaging Waste Regulation 2025/40 (PPWR) regulates what kind of packaging can be placed on the EU market, as well as packaging waste management and prevention measures. It includes restrictions on certain single-use plastics, and minimising substances of concern, including PFAS.

More generally, the 2021 European Climate Law (Regulation (EU) 2021/1119) mandates Members States to 'take into account the particular vulnerability of the relevant sectors, inter alia, agriculture, and of water and food systems, as well as food security, and promote nature-based solutions and ecosystem-based adaptation.'

Research, innovation, and startups

Research and innovation in the EU aim to support all of the above goals through varying means.

Horizon Europe, the EU's flagship research funding scheme⁴⁸, has a focus on 'chemical risk assessment' and a 'European Research Area for health' under Cluster 1 (of Pillar 2), and on 'fair, healthy and environmentally friendly food systems and primary production to consumption' under Cluster 6. Horizon Europe also includes relevant EU Missions, on Cancer⁴⁹ and on Soil⁵⁰.

Two strategic approaches – currently under revision – drive EU R&I actions: the Strategic approach to EU Agricultural R&I⁵¹, and Food 2030⁵². The coming EU Agricultural Research and Innovation Strategic Approach, planned for mid-2026, aims to secure the long-term competitiveness, sustainability and resilience of the EU's agri-food sector, forestry and rural

⁴⁸ https://research-and-innovation.ec.europa.eu/funding/funding-opportunities/funding-programmes-and-open-calls/horizon-europe_en

⁴⁹ https://research-and-innovation.ec.europa.eu/funding/funding-opportunities/funding-programmes-and-open-calls/horizon-europe/eu-missions-horizon-europe/eu-mission-cancer_en

⁵⁰ https://research-and-innovation.ec.europa.eu/funding/funding-opportunities/funding-programmes-and-open-calls/horizon-europe/eu-missions-horizon-europe/soil-deal-europe_en

⁵¹ https://agriculture.ec.europa.eu/overview-vision-agriculture-food/research-innovation/strategic-approach_en

⁵² https://research-and-innovation.ec.europa.eu/research-area/environment/bioeconomy/food-systems/food-2030_en

areas, and contribute to the objectives of the Vision for Agriculture and Food and other Commission initiatives. Food 2030 is the research and innovation policy framework supporting the transition towards sustainable, healthy and inclusive food systems, that respect planetary boundaries. It is in line with and supports the goals of the European Green Deal, the European Life Sciences strategy, the Biotech Act and the Bioeconomy strategy. Its main goals are to support 'nutrition for sustainable and healthy diets', 'food systems supporting a healthy planet', 'circularity and resource efficiency', and 'innovation and empowering communities', while addressing the major research and innovation gaps and boosting innovation in the food sector.

The Commission's Biotech Act I proposal from 2025 aims to expand EFSA's mandate to encompass all aspects of nutrition and to enable it to provide advice concerning the nutritional properties of food products and practices.

Lastly, the EU startup and scaleup strategy (COM/270/2025) aims to 'address the needs of innovative companies throughout their development', including 'fostering innovation-friendly regulation'.⁵³

3. Request to the Group of Chief Scientific Advisors and the European Group on Ethics in Science and New Technologies

Given the complexity of the issues related to UPF, particularly as regards their impact on health, evidence about possible human health risks related to UPF consumption should be identified. The impact of UPF production should also be analysed, including on the environment, socioeconomic impacts, as well as ethical, moral, legal and equality issues.

Considering this policy background, the Group of Chief Scientific Advisors (GCSA) and the European Group on Ethics in Science and New Technologies (EGE) are asked to answer the following questions:

GCSA:

With regard to supporting flagships 2 and 4 of the Safe Hearts Plan, and considering the Vision on Agriculture and Food and the Life Sciences Strategy, what scientific considerations should underpin EU policies in fostering healthier diets in view of what is known about the health effects of consuming so-called 'ultra-processed foods' (UPF)? In answering this question, the following sub-questions should also be addressed:

- a) Which are the prominent definitions for UPF and classifications including a UPF category, and to which extent can they constitute an appropriate and effective basis for policymaking?
- b) What is the current state of scientific knowledge about the health effects of UPF?
- c) What are the patterns of UPF consumption in the EU?
- d) Based on available scientific evidence, which criteria/markers could be used to develop a useful assessment of the health effects of these foods? Such criteria/markers should be specific enough to inform work aiming to empower consumers to shift towards healthier diets and to contribute to targeting other national or EU wide public health measures that improve dietary intakes. To identify those criteria/markers, the following should be considered, among others: degree/type of ultra-processing, energy density, nutrients, ingredients (e.g. food additives and

⁵³ https://research-and-innovation.ec.europa.eu/strategy/strategy-research-and-innovation/jobs-and-economy/eu-startup-and-scaleup-strategy_en

flavourings)⁵⁴, portion sizes and consumption frequencies, and the role of individual foods in providing essential nutrients and contributing to meeting dietary intake recommendations.

EGE:

With regard to the Safe Hearts Plan, considering the Vision on Agriculture and Food and the Life Sciences Strategy, what ethical considerations should guide policy action in the EU on addressing ultra-processed foods (UPF) from production to consumption, including in relation to health protection, the right to access to adequate and nutritious food, consumer protection and autonomy, social justice, corporate responsibility, animal welfare and environmental impacts? In answering this question, the following sub-questions should also be addressed:

- a) What ethical and societal challenges arise from the evidence on the patterns of UPF production and consumption across the EU and their links with social inequalities, and economic dimensions (e.g. retail offer, availability, labour, pricing, market concentration, data collection and ownership)?
- b) What ethical and societal challenges arise from the environmental externalities associated with UPF across their value chains in the frame of the European Union's broader food-system sustainability and social equity objectives?

The scoping questions for both groups should be analysed by reviewing the relevant evidence – from all relevant disciplines, including the social sciences, humanities, environmental sciences, medical sciences and psychology, food and nutrition sciences, and public health – with a systemic approach that considers the complexity of all aspects of the issue. The analysis should also consider and point out where evidence is credible, limited or missing, and how the evidence base could be improved (research gaps). The two Groups will coordinate and, where relevant, discuss issues that relate to the expertise of both groups. The Opinions should not focus on food security outside of the EU or on diets of people with specific needs.

The science and ethics advice should be delivered by Q1 2027.

⁵⁴ N.B.: The safety of individual substances per se is subject to EFSA risk assessments, as part of the pre-market EU authorisation process.