



Open letter to Ms Sandra Gallina and Ms Elisabeth Werner

Director General of DG Sante and Director General of DG Agri
European Commission
Rue de la Loi 200,
1049 Brussels

[via email]

Brussels 16 December 2025

Dear Ms Gallina and Ms Werner,

Ultra-processed foods (UPFs) have been gaining a lot of interest among researchers and in the media, particularly in recent months. In November The Lancet¹ released a series dedicated to the issue and the timing now is appropriate to share with you our perspective as foodwatch.

foodwatch is a European non-profit consumer organisation that has been fighting for safe, healthy and affordable food for all people since 2002. foodwatch operates at the national and European levels and has offices in Austria, France, Germany, the Netherlands and Brussels. We count over one million supporters in the EU.

With this letter we are calling to you to respond to our call for **five measures to deal with UPF and the one over-arching criterion**, all of which are scientifically backed up and can be implemented quickly.

General remarks

Any policy discussions on UPF need to bear in mind that we are not only talking about the ingredients and processing of a food but also a whole system that is both heavily marketed and enjoying a privileged position in the food environment, and also ensuring corporate control of the entire food chain.

The vast majority of UPFs are bad for our health and the scientific evidence for that

¹ <https://www.thelancet.com/series-do/ultra-processed-food>

is growing stronger and stronger²: The consumption of UPFs seems to be an important risk factor for a range of Non-Communicable Diseases (NCDs) such as heart disease, cancer and metabolic syndrome. Scientists are still trying to pin down how exactly different types of UPFs influence health outcomes. However, the usually high amounts of sugar, salt and fat as well as the degree of processing and the presence of additives that alter texture and taste seem to play an important role. UPFs are made to be ultra palatable, and these factors together can encourage overeating, but it could also impact the way the body takes up nutrients or reacts to certain ingredients. Contaminants from processing or packaging can also negatively impact health.

The proliferation of ultra-processed foods (UPF) is emblematic of a broken food system – one that operates upside down and harms consumers: The food industry pushes these products with all their marketing power because ultra-processed foods are highly profitable. They are formulated in a way that often makes us eat and want more. They are easily and readily available almost everywhere – not just in supermarkets but in schools and workplaces, at almost every railway stop, in vending machines everywhere and every little corner shop. They are usually cheap to make because they often consist of cheap bulk crops like wheat, sugar or fats and are made ultra-palatable with the help of advanced food technology and additives. As this also usually leads to a long shelf life and easy, global transport and marketing, it improves the profitability even further. The food industry regularly targets vulnerable groups, especially children, with their marketing for ultra-processed foods to build lifelong preferences.

There is enough evidence on UPF to warrant public health actions: To protect consumers' health, policymakers need to act swiftly. Several policies could be implemented immediately, based on existing sound scientific evidence. The cases for taxing soft drinks, restricting food marketing aimed at children or restricting the use of certain additives for example are clear and have been clear for many years. Unfortunately, government action in most countries has been slow or is non-existent. Some few national dietary guidelines already give the advice to limit the consumption of highly processed food, e.g. Belgium, Netherlands, and Canada. Action at EU level is only now starting to be discussed. However, as governments hesitate, people are suffering.³

² Ultra-processed foods and human health: the main thesis and the evidence
[https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(25\)01565-X/abstract](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(25)01565-X/abstract)

³ New data: noncommunicable diseases cause 1.8 million avoidable deaths and cost US\$ 514 billion every year, reveals new WHO/Europe report <https://www.who.int/europe/news/item/27-06-2025-new-data--noncommunicable-diseases-cause-1-8-million-avoidable-deaths-and-cost-us-514-billion-USD-every-year--reveals-new-who-europe-report>

5 measures and 1 overarching criterion to implement without delay

There is enough sound evidence for political action to reduce the negative health effects of UPFs on consumers. Here is a list for starters, supported by science and health organisations for a long time⁴:

1. **Ban on marketing of unhealthy food to kids:** Food marketing to children must have legally binding restrictions based on the WHO guidelines⁵ for all unhealthy foods, across all means (television, online, sponsorship) where children are part of the audience.
2. **Introduce an effective soda tax:** Producers of soft drinks should be taxed according to the degree of sugar and sweeteners in their products to encourage reduction. An effective system would be based on the one from the UK⁶.
3. **Ban sales of energy drinks to under minors:** ban on the sale of energy drinks to children across the EU, to protect their health, especially cardiovascular health.⁷ A child is a person below the age of 18.⁸
4. **Harmonised and mandatory front of pack nutritional label:** The Commission must meet its commitment in the Beating Cancer Plan. There is no more time to lose to develop a new label, the Commission must propose the label that is most known and proven to work and supported by IARC⁹: Nutri-Score. This will already help inform consumers about UPF since 87.5% of UPF fall into the C to E category¹⁰.

⁴ <https://www.paho.org/sites/default/files/2024-12/brochure-ncd-best-buys-web-eng-compress.pdf> and <https://nutriscore.blog/2022/12/19/a-group-of-320-scientists-and-health-professionals-released-a-comprehensive-scientific-report-explaining-why-the-european-commission-must-choose-the-nutri-score-nutrition-label-a-pu/> and many other sources

⁵ <https://www.who.int/publications/i/item/9789240075412> and the guidelines produced to implement them <https://www.unicef.org/documents/nutrition/food-marketing-toolkit>

⁶ <https://www.medrxiv.org/content/10.1101/2025.04.30.25326734v2.full>

⁷ Oberhoffer FS, Bienenstein E, Li P, et al. (2023) Energydrinks und ihre Auswirkungen auf die Herz-Kreislauf-Funktion bei Kindern und Jugendlichen. Monatsschr. Kinderheilkd. 1-4. doi: 10.1007/s00112-023-01791 and <https://www.bfr.bund.de/presseinformation/uebermaessiger-konsum-von-energy-drinks-erhoeht-gesundheitsrisiko-bei-kindern-und-jugendlichen/>

⁸ Six EU Member States have taken action and introduced a legal age limit of 18 for sales: Latvia, Lithuania, Poland, Romania, Hungary, Bulgaria. This means that children within the EU are not currently treated and protected equally.

⁹ https://www.iarc.who.int/wp-content/uploads/2021/09/pr301_E.pdf

¹⁰ <https://nutriscore.blog/2025/10/31/the-nutri-score-nutrition-label-justifications-scientific-basis-user-guide-benefits-limitations-deployment-and-update/#9.4>

5. **Improve legislation on additives in food:** Prohibit potentially harmful additives such as Aspartame¹¹; improve the approval system¹² and ensure correct labelling with both name and E number in the ingredients list¹³.

Plus 1 overarching criterion:

To implement these policies, it is vital that **the food industry is excluded from policy making**. The food industry heavily contests the concept of and concerns around UPF as it threatens their most profitable products. Based on tactics established by the tobacco industry, the food industry does and will fight attempts to label, restrict or regulate UPFs. The food industry has put billions of euros into lobbying against a front of pack nutritional label since 2010¹⁴. These tactics include bashing independent scientists, producing their own, biased science, blaming consumers or offering public-private partnerships instead of regulation as solutions. Policy makers must not fall for this but stand up to “Big Food” to protect consumers and public health.

The scientists behind The Lancet report call for a **unified global response to the rise of UPFs in human diets by understanding the commercial determinants, countering corporate power and mobilising a public health response**. For the moment the reaction from the European Commission is to announce “A Study into the health impacts of UPF” in the Vision for Agriculture in March 2025 (DG AGRI) and again in the EU Cardiovascular Health Plan in December 2025 (DG SANTE). As made clear the The Lancet series: *“although more research is clearly warranted, the need for further evidence should not delay public health action.”*¹⁵

We are publicly asking you: **how you will take the urgent and necessary action needed to protect the health of people in the EU, especially children?**

¹¹ <https://www.foodwatch.org/en/over-350000-citizens-call-for-an-eu-wide-ban-on-aspartame-civil-society-petition-handed-over-to-the-european-commission>

¹² There are over 300 food additives approved for the EU market. For some additives there is growing scientific evidence about negative health impacts, however, the regulation does not include any option for re-evaluation besides the existing review programme that was supposed to end by 2020 and is heavily delayed. This means that additives already reapproved through this review programme or put on the market at a later date are granted unlimited authorisation. Furthermore, approval is often based on industry funded research. foodwatch demands that the existing positive list of additives should be re-evaluated regularly. A possible cocktail effect of long-term consumption of a multitude of additives should also be taken into account. Approval has to be based on independent science.

¹³ Consumers want to avoid UPFs, but they do not know what they are. This could be helped in better labelling of additives on the back of the pack. The so-called ‘clean label’ movement is benefiting from legislation which allows the company to choose if they write the E number OR the name of the additives of the ingredients list. Needing to write BOTH would help consumers assess the number of additives in a product.

¹⁴ <https://corporateeurope.org/en/2010/06/red-light-consumer-information>

¹⁵ [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(25\)01565-X/abstract](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(25)01565-X/abstract)

We look forward to your responses and both this letter and your responses will be made public.

Yours sincerely

A handwritten signature in black ink, appearing to read "S. E. Sumner". The signature is written in a cursive style with some flourishes.

Suzy Sumner

Head of Brussels Office for foodwatch international