

## Forthcoming study on Ultra-Processed Foods (UPFs) and the need for comprehensive action on unhealthy diets

Brussels, 8 June 2026

Dear Commissioner Zaharieva,

*Cc: Olivér Várhelyi, Commissioner for Health and Animal Welfare;  
Stéphane Séjourné, Executive Vice-President for Prosperity and Industrial Strategy;  
Christophe Hansen, Commissioner for Agriculture and Food.*

We write as a group of 21 organisations representing civil society, health associations, and medical professionals in the context of the European Commission's forthcoming study on Ultra-Processed Foods (UPFs), to **call for urgent and comprehensive EU policy action to address unhealthy food environments**, and to request a meeting with you on this topic.

Today's food environments are stacked against healthy diets in multiple, reinforcing ways. UPFs and foods high in fat, salt and sugar (HFSS) are the most heavily promoted, most conveniently placed, and most aggressively marketed products in our shops, online platforms, schools and streets. Meanwhile, fresh vegetables, fruits, legumes, and wholegrains, which are the foods most closely linked to good health outcomes, remain comparatively expensive, less available, and barely promoted. Research consistently shows that price is one of the most important purchasing drivers,<sup>1</sup> particularly for households on tight budgets: **when healthy food costs more and unhealthy food is everywhere, the notion of "free choice" is illusory for a significant share of the population.**

The problem goes beyond price. UPFs are often engineered to stimulate the brain's reward system and encourage overconsumption.<sup>2</sup> Digital marketing, powered by vast personal data, enables ever more tailored and persuasive promotion of nutritionally poor food. Children and adolescents are especially vulnerable: early and repeated exposure to aggressive marketing shapes taste preferences and consumption habits that persist into adulthood.

According to the European Food Safety Authority (EFSA), saturated fats, sodium, and added sugar intakes exceed recommendations in most European populations, while intake of dietary fibre (found in fruits, vegetables, legumes, pulses, nuts, berries, and wholegrains) is inadequate. UPFs account for around a quarter of total energy intake across EU Member States.<sup>3</sup> Lower-income groups and younger generations consistently show the highest rates of both UPF and HFSS consumption, as well as the greatest shortfalls in fruit and vegetable intake.

The public health and economic costs are immense. Diet-linked non-communicable diseases (NCDs), including cardiovascular disease, cancer and diabetes, are the leading causes of preventable death and long-term disability in the EU, and represent a major burden on public healthcare and social security systems.<sup>4</sup> The number of European children living with obesity will increase by around 60% by 2035,<sup>5</sup> disproportionately coming from disadvantaged backgrounds. A significant share of these costs falls on local and regional authorities, particularly in lower-income areas where unhealthy food environments are most concentrated.

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<sup>1</sup> BEUC (2020). [One bite at a time: Consumers and the transition to sustainable food.](#)

<sup>2</sup> Calcaterra *et al.* (2023), "[Ultra-Processed Food, Reward System and Childhood Obesity](#)".

<sup>3</sup> EuroHealthNet (2025). [Policy Precip on Tackling ultra-processed food for a healthier and just food system.](#)

<sup>4</sup> OECD (2023), [The Health and Economic Benefits of Tackling Non-Communicable Diseases](#), OECD Publishing, Paris.

<sup>5</sup> World Obesity Federation (2023), [World Obesity Atlas 2023.](#)

We therefore **urge the Commission to take a whole-portfolio approach**. The overconsumption of HFSS foods and UPFs and the under-consumption of healthy whole foods are deeply interlinked challenges: they cannot be addressed in isolation. Tackling only one risks inadvertently worsening the others. For instance, when only sugar in soft drinks is taxed, manufacturers have responded by substituting artificial sweeteners. Similarly, a diet free of UPFs can still be dangerously high in saturated fat, or insufficient in fruit and vegetables. Effective policy must therefore ensure that **food environments offer less of what is unhealthy (HFSS foods and UPFs) and more of what is healthy (vegetables, legumes, fruits, nuts, wholegrains, etc)**.

### **Act now: immediate policy measures on HFSS and improving access to healthy food**

We urge the Commission not to delay action on HFSS foods or on improving access to healthy foods, pending the outcomes of the UPF study. The following measures can and should be pursued immediately:

- **Ban advertising of HFSS foods to children:** Ban or significantly restrict marketing and advertising of HFSS foods to minors, both offline and online. The ongoing review of the Audiovisual Media Services Directive offers a timely and important opportunity to introduce such restrictions at EU level.
- **Strengthen public food procurement and school food environments:** Build on the updated Joint Research Centre's recommendations by developing a stronger EU framework for healthy public procurement, with clear minimum nutritional requirements, implementation support, and monitoring. In parallel, maintain and strengthen the EU School Scheme to improve children's access to fruit, vegetables, and healthier diets.
- **Incentivise companies to reformulate particularly unhealthy food categories** (such as ready-made meals, soft drinks and packaged snacks) to improve their nutritional content.
- **Mandatory front-of-pack nutrition labelling:** Introduce mandatory front-of-pack labelling that provides consumers with clear, science-based information.
- **Public subsidies should be reoriented** away from HFSS foods, and towards healthy foods. EU, national, regional and municipal funding should actively make healthier foods more affordable and accessible, particularly for lower-income households, rather than driving poor health. EU farm products promotion funds should be diverted away from HFSS foods, and used instead to promote fruit, vegetables, nuts, legumes and wholegrains.

### **On the forthcoming Commission study on ultra-processed foods**

We welcome and support the Commission's forthcoming study on Ultra-Processed Foods (UPFs) and its goal of translating scientific evidence into actionable EU policy. We encourage the Commission to ensure that it:

- **Is guided by science, not by industry interests.** The study must be carefully protected from influence by parties with a direct economic stake in its outcome, including the lobby associations and affiliated think-tanks of agricultural producers, food manufacturers, and retailers. These actors must not shape the scientific framing, methodology, or policy conclusions.
- **Covers all UPFs.** The study should examine the full breadth of ultra-processed food products, without excluding or deprioritising any subcategory at the outset.
- **Proposes science-backed, impactful policy measures.** We recommend that the study proposes concrete regulatory measures, applying a UPF lens to the full set of policy tools already being considered for HFSS foods (listed above). The study should be explicitly geared towards action: not only describing the problem, but identifying the policies needed.
- **Is developed through a transparent process.** The Commission should ensure transparency in the selection of the experts responsible for drafting the report, including by publishing the selection criteria used and the experts' declarations confirming the absence of conflicts of interest.

Given the cross-cutting nature of this issue, we would welcome an exchange on how EU action on food environments can contribute simultaneously to health, child wellbeing, social fairness, sustainability and long-term resilience across the Union.

Yours Sincerely,

