

**leatherhead
food research**

part of SAGENTIA REGULATORY

Interactive session: EU nutrition update policy direction and reformulation pressure

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Agenda

1. Legislative progress vs. reformulation pressure in the EU
2. Key developments this year
3. Takeaways for Q4 and beyond



No major new EU legislation does not mean less pressure to reformulate

Why

Obesity and NCD prevention remain high on the EU and Member State health agenda

What

Less of the bad

**More of the
good**

**Transparent
communication**

Who

Supranational bodies, member states, NGOs, retailers, consumers, litigation & enforcement

How

Taxation

FOP nutrition

Marketing
restrictions

Placement and
promotion

Incentives to
reformulate

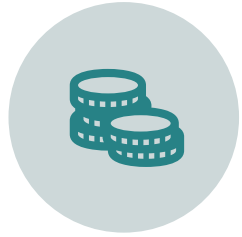
When

Maybe sooner, rather than later at a **national level**

A shift in approach and attitudes in Europe



HOW? Categorising an expanding toolbox of policy measures



Tax and levy's

Sugar → HFSS →
UPF?



Marketing restrictions

HFSS and alcohol



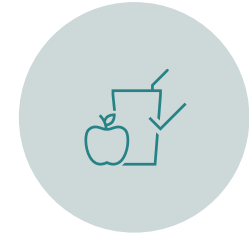
Retail pressure

salt, sugar and
saturated fat



Incentivising

whole grain, fibre,
micronutrients &
protein



Information pressure

FOPNL & claims



Global policy

EU / Codex /
WHO



Procurement

schools and
hospitals



Voluntary

reformulation
standards



Reputation

NGOs &
corporate
commitments



“Influencers”

Supranational
institutions →
crises & culture

Key developments in the EU



1. Ultra-processed food proposals



Key dates

March 2027
Research
Publication

Supranational (EC)
Regulation



EC Safe Hearts Plan

- “*The increase in NCDs linked to **unhealthy diets and so-called ‘ultra-processed foods’** makes it necessary to provide clear information to empower citizens to choose healthier food options*”
- *Evidence-based information on food can also serve as a basis **for EU or national level interventions** addressing unhealthy foodstuffs and **incentivising reformulation**”*

Announcement:

EU CVD plan to include levy on HFSS and UPF

Sept 2025

Draft proposal:

- Highly processed
- HFSS
- Alcopops

Nov 2025

Significant opposition:

FDE highlighted scientific debate around UPF definitions

Late 2025

Sept 2026 to
March 2027

GCSA mandate:

March 2027 delivery date

Q2 2026

New research approach:

NGOs continue to urge for action to EP

Dec 2025

Commitment disappears:

CVD strategy no longer includes drafted commitment

2. Poland – expansion of sugar taxes



Key dates

- 1 January 2027
- Not yet adopted

Fiscal



Expansion of scope proposed – removing several important exemptions

1. **Drink concentrates** including syrups and concentrates will become taxable
2. **Drinkable food supplements** would be brought into scope – *small portion supplements not the intended target*
3. **Juice containing beverages** where they also contain **sweeteners, caffeine or taurine**



Energy drinks targeted with highest relative levy increases

- Caffeine and taurine; **presence** vs. threshold (e.g. 150 mg/L)



Broadening category definitions, a focus on energy drinks and hikes in excise through existing measures are likely to spread

3. France-driven FOPNL progress



Key dates

- Transition ends 1 Jan 2027

FOPNL



Retail

Updated algorithm welcomed by NGOs and retailers and adopted by the '7'

1. **Stronger penalties for sugar and salt and stricter treatment of drinks**
2. **Penalties for sweeteners in beverages** – only water now eligible for 'A'
3. **More favourable treatment of fibre and wholegrain**
4. **Healthier oils (unsaturated fats)** – typically upgraded



ULTRA-PROCESSED
FOODS



NOT ULTRA-PROCESSED
FOODS



1. Updated algorithm will inform future HFSS restrictions
2. Sweetener penalty and 'UPF' deliberation signals a blurring of boundaries beyond HFSS for nutrient profiling

4. Nordic keyhole



Key dates

- 1 April 2027 application
- Transition ends 1 October 2028

FOPNL



Retail

Nutrient	Nordic keyhole revision	Reformulation pressure
Salt	Lower salt thresholds across many categories	Strong pressure in bread and processed foods
Wholegrain	Tougher wholegrain requirements	Increased emphasis on wholegrain content vs. inclusions
Fibre	Higher requirements in some foods	Strong incentive for fibre enrichment
Fat quality	Shift in emphasis from total fat to fat quality	More favourable treatment of nuts and seeds
Sugar	No major revisions	Already strongly incentivises sugar reduction



Increasing alignment (convergence) towards the same priorities;
many current logo users will need to reformulate

5. HFSS advertising restrictions



Key dates

In force or
coming soon

Marketing & Promotion
Restrictions



France



- Influential NGO groups have emphasised importance of restrictions from **retailers** in policy papers – *A case of “when, not if”*

Spain



- April 2026 – many restrictions in **schools**
- Broader proposal in discussion to restrict marketing to children for HFSS more broadly

UK



- Updated “NPM” published in Jan 2026
- **Consulting on** existing HFSS advertising and promotion policies

Expansion of restrictions



New food advertising code (Jan 2026)

- Restrictions extended from <13y to <16y
- Coverage explicitly includes **social media ads**



Revised Advertising Code for Foods (Feb 2026)

- **General prohibition** on advertising food to children from <7y to <13y
- **Only permitted products** may be advertised to children 13y to 16y

Urgency

6). Ireland draft nutrient thresholds For NPD not existing foods

- **21** food categories now in scope (8 added)
- FBOs are '*requested*' to bring new foods to market that are '*as close to*' the energy kcal and nutrient (SF-S-S) targets as possible
- Industry feedback considered



Key dates

- 18 September
- *Consultation Closed*



Voluntary



2026

Food Reformulation Task Force:
DRAFT energy and target nutrient
thresholds for use in new product
development

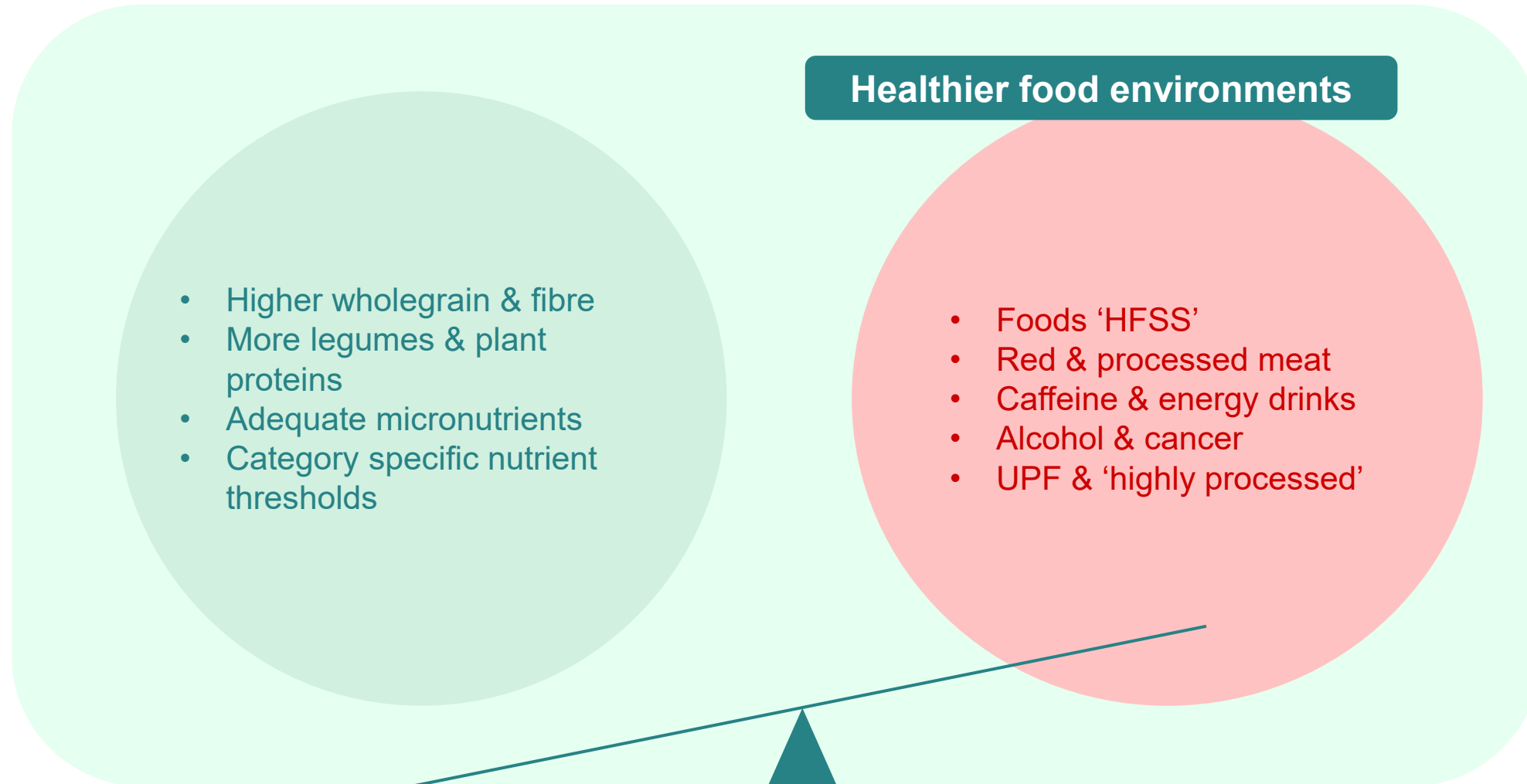


How will these be used and will the thresholds remain 'voluntary'?

Key points to takeaway from 2026



Key reformulation targets



Strategic takeaways for regulatory affairs

Where to focus effort in the short-mid term

Broadening definitions of “Nutrient Quality”

- **Nutrient profiling as the basis for targets is evolving**
- ‘Less of the bad’ HFSS – *certainly*
 - Caffeine - *likely*
 - UPF – *unlikely*
- ‘More of the good’

Pressure to reformulate is building

- **Pressure being applied across multiple fronts**
- MSs are intervening frequently
- Vulnerable populations and teens
- **Benchmark against category** as well as nutrient profiling thresholds

Monitor EU first movers closely

- **Critical momentum building on some key issues**
 - Caffeine and alcohol
 - Marketing restrictions
 - Retailer positions
- **Engage early** with policy makers & associations (e.g. Irish consultation)

Questions?

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