













Nutrition & food for thought

for the EU's term 2024-2029

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Most Europeans will use specialised nutrition at some point in their lives.

Specialised nutrition gives nutritional protection and support when people need it most: when they are vulnerable or ill, or at times when they have special nutritional needs that common foods cannot meet. People with specific nutritional needs include infants and young children and people with medical conditions, disorders and diseases. In addition, people with coeliac disease, as well as sports people and those managing their weight require specialised nutrition.

At Specialised Nutrition Europe (SNE), we unite and represent the specialised nutrition industry across Europe to contribute to positive framework conditions for our products for people with specific nutritional needs.

SNE's national associations

are present in 19 **European countries**

and have a combined membership of over 280 member companies, with an annual turnover exceeding € 25 billion.



Specialised nutrition product categories covered by SNE

Foods for Infants and Young Children



While the majority of babies in most European countries are initially breastfed, the vast majority of babies also receive formula at some stage - the only safe alternative to breastmilk when babies are not breastfed. Baby foods help in the move from a liquid diet to one which includes solid foods. Young Child Formula is one vehicle to ensure proper nutrient intake of young children.

Foods Intended for Sports People



38% of EU citizens exercise or play sports at least once a week". Sport Foods are designed to provide athletes and people exercising sport with nutritional products tailored to meet their needs.

Gluten-Free Foods

1 in 100 people in Europe are estimated to suffer from coeliac disease".

Gluten-Free Foods act as effective and healthy substitutes for products that normally contain wheat, rye or barley and allow coeliacs to enjoy a varied and complete diet with confidence.

Ljungqvist O & de Man F (2009). Undernutrition – A major health problem in Europe. Nutr Hosp 24:368-370

Eurobarometer Sport and physical activity, 2022

"Association of European Coeliac Societies (AOECS), consulted on 6 October 2023: https://www.aoecs.org/

Foods for Special **Medical Purposes**



Did you know that 33 million people in Europe are at risk of malnutrition?

Foods for Special Medical Purposes are designed to meet the nutritional or dietary needs arising from a wide range of medical conditions, including for example babies with allergies and certain cancer patients.

Foods Intended for Weight Control



Obesity is one of the most serious public health concerns of the 21st century. Foods Intended for Weight Control are designed to help people living with obesity or overweight to manage their weight.



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Our requests to European decision-makers:

Common standards to guarantee the best nutrition for vulnerable groups

- Solid and specific regulation for all foods for specific groups, especially for Young Child Formula for children from 12 to 36 months and Sport Foods, which are both currently excluded from the EU's strict Foods for Specific Groups Regulation.
- To ensure consistency with the international framework, the composition of Young Child Formula should be regulated at EU level in alignment with the newly revised Codex Alimentarius Standard^{IV} for Follow-Up Formula.
- The composition of **Sport Foods** should also be regulated at EU level.
- We support strict food safety rules in the EU, as the nutrition and protection of vulnerable groups is our top priority. However, thresholds and transitions have to be reasonably achievable, and we encourage policy makers and institutions to prioritise scientific evidence and sound risk assessments over campaigns.

Enable consumers to make informed choices

- Avoid a one-size-fits-all for nutrition labelling: Because neither babies nor sportspeople have the same nutritional requirements as average consumers, a nutri-score or similar scheme must not treat specialised nutrition categories the same as general foods^v.
- Enable digital labelling solutions for information such as recycling of packaging material, which is not as essential as, for example, ingredients and allergens.
- Make it possible for all specialised nutrition products to comply with organic labelling schemes.
- Develop Nutrient Reference Values for the labels of products for young children (12-36 months), as reference values for specific population groups are foreseen in the EU's Food Information to consumers regulation since 2011.

Better address obesity, malnutrition, and food allergies

- Develop an EU nutrition and health agenda with all stakeholders to tackle today's societal challenges such as obesity, malnutrition or food allergies.
- Help raise awareness about the importance of nutrition in general and about the EU rules on foods for specific groups in particular, e. g. by communicating with healthcare professionals.
- Healthcare professionals have a key role in advising parents and patients about nutrition, but their studies and training should include more detail on nutrition. The EU could help with capacity building for European-level medical societies. Our industry commits to the highest ethical standards when interacting with healthcare professionals and we published the SNE Code of Practice in 2023^{VI}.

Safeguard the internal market and an enabling food policy

- We regret that Member States' differing approaches on some of the aforementioned product groups result in barriers to the internal market.
- We encourage the **EU Commission to take its responsibility** by issuing interpretation decisions as foreseen in the Regulation on Foods for Specific Groups, in the interest of specific and vulnerable groups of consumers.
- We fully support FoodDrinkEurope's 5-step plan to achieve a sustainable and resilient food future, with its calls to stimulate investment, support innovation, boost trade and secure supply, build better regulation and improve governance and coordination. For example, a dedicated Executive Vice-President of the European Commission for Food to help avoid trade-offs on food safety, environmental goals, food security and economic sustainability^{VII}.

[°]SNE position: Ensuring consumers' informed choice on specialised nutrition, December 2021

™The SNE website's section on 'interaction with healthcare professionals' features inter alia the SNE Code of Practice

™FoodDrinkEurope, 5 step plan to achieve a sustainable and resilient food future, 2023



Support the health and well-being of vulnerable populations

When mothers are unable to, or choose not to breastfeed, infant formula is the only suitable alternative. Foods for Special Medical Purposes are essential for many patients (e. g. malnutrition, metabolic disease). Gluten-Free products are essential for the more than seven million Europeans who are affected by coeliac disease. It is essential to have an enabling regulatory and legal framework for a European industry with a broad set of companies to supply consumers with specific nutritional needs consistently and safely.



Reduce the burden on healthcare systems

A balanced diet is a key part of a healthy lifestyle, and specialised nutrition products can help fight both obesity and malnutrition. In Europe, 33 million adults are malnourished or at risk of disease related malnutrition, which means that they are lacking essential nutrients in their diets. This costs European countries € 170 billion a year VIII. Foods for Special Medical Purposes are vital in helping to manage disease-related malnutrition. Total diet replacement products for weight control are specially formulated for overweight or obese adults who want to lose weight.

Decision-makers should have an interest in a successful **European specialised nutrition** industry if they want to:



Boost the fight against obesity and promote physical activity

With 59% of Europeans being overweight or obese^{IX}, the practice of sports and the implementation of slimming strategies are essential, and specialised nutrition supports both. Foods for Weight Control help people to take back control of their weight. Sport Foods are essential to help many athletes and amateurs meet their nutritional needs before, during, and after intense physical activity.



Enhance Europe's innovation, employment, and competitiveness

The specialised nutrition industry invests in research and innovation to develop new products and improve existing ones. The market for specialized nutrition products is expanding globally, and companies from and operating in Europe play a leading role. The product groups covered by SNE represent an annual turnover of over € 25 billion, and infant foods are one of the EU's top agri-food exports^x.