

## Specialised Nutrition Europe (SNE) Response to the Public Consultation – A Strategic Vision for Sport in Europe Reinforcing the European Sport Model

### Recognising sport nutrition as an essential pillar of the European Sport Model

Specialised Nutrition Europe (SNE), the voice of the specialised nutrition industry in Europe, welcomes the European Commission’s initiative to develop a Strategic Vision for Sport. We strongly support the recognition of sport as a driver of health, inclusion, education and sustainable growth. We recognize the valuable insights provided in the consultation; however, we see an important opportunity to further enhance the discussion by addressing one of the most fundamental pillars underpinning sport and athlete wellbeing: **nutrition**.

Nutrition is inseparable from sport. Athletes and active citizens have **nutritional needs that differ significantly from the general population**. EFSA’s 2015 opinion<sup>1</sup> on sports nutrition confirmed that those engaging in physical activity of varying intensity require **specific nutrient intakes**, particularly with regard to macronutrients, hydration and electrolyte balance. Similarly, the Commission’s 2016 report on “Foods Intended for Sportspeople”<sup>2</sup> recognised that, while not defined in EU law, sports foods are distinguished by their **targeted composition, intended use and labelling**. In practice, sportspeople rely on such products to manage performance, recovery and long-term health.

Historically, these specificities were acknowledged. Under Directive 2009/39/EC on foods for particular nutritional uses, **sports foods were recognised as a distinct category**.

However, since the repeal of that Directive and the adoption of Regulation (EU) 609/2013, sports foods have been treated as general foods, without regulatory adaptations to reflect their distinct role. **The Commission’s 2016 report concluded that no specific provisions were strictly necessary, but at the same time acknowledged that the specific nature of these products may need to be taken into account in the application and implementation of current horizontal EU rules. So far, no such measures have been taken.** This ambiguous approach has resulted in regulatory uncertainty, fragmented national practices, and barriers to innovation across the Internal Market.

This regulatory vacuum presents **tangible risks for consumers**:

- **Lack of oversight** allows rogue traders to market products with unsafe compositions.
- **Inconsistent nutrient levels** - too high or too low - can undermine performance, recovery, or even pose health risks.
- **Fragmented national approaches** create confusion and limit consumer access to safe, effective products across borders.

Treating sports foods as general foods fails to reflect their specific function in supporting active lifestyles. Existing rules on composition, claims, and labelling do not always align with the

<sup>1</sup> EFSA (2015). Scientific and technical assistance on food intended for sportspeople. <https://doi.org/10.2903/sp.efsa.2015.EN-871>

<sup>2</sup> European Commission (2016). [Study on food intended for Sportspeople](#).

legitimate nutritional needs of sports people. This concern was already raised in SNE's 2017 joint call with other associations<sup>3</sup>, urging the Commission to establish an appropriate framework for sports foods that supports both consumer protection and innovation.

A proportionate, harmonised framework at EU level would bring benefits to all:

- For athletes and active citizens, it would ensure access to safe products with clear, reliable labelling and usage information.
- For the sport movement, it would strengthen athlete health and wellbeing as a key part of the European Sport Model.
- For the food sector, it would provide legal clarity, encourage responsible innovation and ensure a level playing field in the Single Market.

SNE therefore calls on the European Commission to explicitly recognise the fundamental role of sport nutrition in the Strategic Vision for Sport and to consider the development of an appropriate regulatory framework for sports foods. Such a framework must acknowledge the specific nutritional demands of sportspeople and provide harmonised EU rules on definitions, composition, claims and labelling, thereby ensuring consumer protection, fostering innovation and supporting the objectives of the European Sport Model.

SNE remains committed to constructive collaboration and stands ready to support this important endeavour to ensure that the regulatory framework is both effective and practical.

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<sup>3</sup> <https://www.specialisednutritioneurope.eu/wp-content/uploads/2019/07/finalcallonsportsfood26june2017-1-1.pdf>