

September 11, 2020

Spain: The publication of a controversial document regarding ultra-processed foods has gained the unanimous support of the most credible and qualified scientists and technicians

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## European Food and Feed Law Review

### Volume 15 (2020), Issue 4

368-369

#### Spain

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**Cristina Vidreras\*** [Review by Luis González Vaqué]

The publication of a controversial document regarding ultra-processed foods has gained the unanimous support of the most credible and qualified scientists and technicians who oppose the use of this pseudo-scientific, misleading terminology.

The *Fundación Triptolemos* (Triptolemos Foundation) recently published a report on food classification, entitled 'The Ultra-Processed Concept'.<sup>1</sup> This paper was approved on 18th February 2020 and it claims that science is the driving force behind all aspects of human development and that the growth of the human race should take place within an ethical framework and in a balanced and sustainable fashion. However, this cannot be achieved if the same evolution does not take place within the global food industry at the same time. For this, the role of science and responsible business activity is fundamental.

With this in mind, researchers from 26 Spanish Universities and the *Consejo Superior de Investigaciones Científicas* (Spanish Senior Council of Scientific Research) were invited to take part in the drafting of the document.

The participants in the making of the Report took into account the fact that processed foods have been part of our diet since ancient times. Food technology has advanced in tandem with humankind. Nowadays, however, its application is complex. A process can be defined as a combination of steps that leads us to obtain a product from raw materials, and each of the steps, when broken down, is an essential procedure. These steps can include any physical or chemical changes. The use of technology is multifaceted but engineering within food processing has succeeded in standardising it perfectly.

An example of this could be the procedures that are carried out in the standard process of milk pasteurisation:

Once milked, the milk is usually filtered (Step 1) to eliminate possible foul contaminants, then it is refrigerated (Step 2) to avoid the development of mi-

crobes, then it is taken by refrigerated transport (Step 3) to the dairy, where it is mechanically clarified (Step 4) by centrifugal force or filtration. It is often skimmed (Step 5), mixed again with some of the original cream to rebalance it; in doing this, the milk retains its original composition and nutritional value (Step 6). Next, it is homogenized (Step 7) so that the cream does not separate from the rest of the milk. Then it is pasteurised (Step 8) to eliminate any pathogenic microorganisms and bottled (Step 9), refrigerated (Step 10) and distributed by refrigerated transport (Step 11) to retail outlets, where it continues to be refrigerated (Step 12). The combination of these dozen steps comprises the process of producing pasteurised milk, one of the most common foods and one that nobody would dare to label 'ultra-processed'.

Technological processes in food have advanced alongside science and technology to ensure that any changes in the nutritional and sensory composition of fresh products are kept to a minimum.

To minimise the risk of error in the production process (especially with regard to temperature control), production companies have implemented auto-control HACCP systems (Hazard Analysis and Critical Control Point).

Anyone who uses the misleading term 'ultra-processed foods' is doing so based on the following criteria:

The number of ingredients;

- If it is a product created using industrial techniques and processes and industrial-use ingredients.

- If its creation has involved stages of production carried out by different companies.

- If additives have been used - even though these are legal - related to enhanced sensory character-

\* General Vice-Secretary of the *Asociación Iberoamericana para el Derecho Alimentario* (AIBADA).

<sup>1</sup> See, <<https://app.box.com/s/ijrriq7m2mr81wy2mb8ml78tmi1y>>.

istics (colourings, texturising agents, flavourings, etc.).

- If it is a product created by new technology despite being a traditional product.
  - If it is not possible to easily identify the principal components.
  - If it is a product with eye-catching packaging.
- and/or
- If it is a product with high economic profitability (?).

In light of some arbitrary as well as biased criteria, the conclusion is as follows:

It is a mistake for this sort of term to be defined based on the number of ingredients it contains, or those which cannot be identified visually, because the risk then is that any complex traditional culinary dish from any country would need to be included in the definition.

The existing definitions of ultra-processed food refer in some cases to the type and extent of processing that the foods have been subjected to and, in other cases, to their development and composition. To classify a food as 'ultra-processed' only by taking into consideration the extent of its processing lacks real meaning, given that the effect of food on health depends to a large extent on its final composition.

In accordance with what has been published in the media with varying levels of scientific rigour, 'ultra-processed foods' are processed foods of which the list of ingredients includes additives (sugars, preservatives, artificial flavourings, and colourings, amongst others), or artificially modified ingredients such as hydrogenated oils, refined flours, etc, in contrast to processed foods, which do not contain such ingredients.

It is a mistake to associate ultra-processed foods with foods of low nutritional quality given that it does not depend on the intensity or the complexity of the process but rather on the final composition of the food.

In using this expression, the intention is to define a process, but what is actually being described is the composition of a mix of various foods that have already been processed. In the mixture, the identity of the ingredients, their quality and the possible additives that may have been used, as well as the technological controls that have been applied, are strictly regulated by the authorities according to highly comprehensive and well-researched scientific reports.

To define something as ultra-processed according to the impact of its packaging or its financial profitability involves the (political?) use of marketing and economic strategies and criteria, but not technological ones.

From a legal perspective, the use of the expression or concept 'ultra-processed' can be sanctionable by political and administrative authorities. In this sense, the European Commission as well as national governments could or should take measures to avoid the use of this expression because the over-use of it confuses the consumer and influences their decisions in terms of buying and legal safety. Nor should it be ruled out that those companies whose products are denigrated by this labelling or classification, seen by potential buyers, might resort to legal measures to seek compensation for the loss and damages caused.

As a result of its thoroughness and reliability, the "Triptolemos Foundation" document has met with virtually unanimous support and numerous endorsements.

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