



## Linking Food Processing to Health Outcomes: A Simplistic and Dangerous Approach

IDF is concerned by the efforts of some policymakers to provide dietary guidance by ranking foods by degree of processing, by using the NOVA system <sup>i</sup>. Although such approaches are presented as contributing to improved nutrition and health, IDF considers the use of the NOVA as well as similar systems that attribute nutritional superiority to less processed foods to be overly simplistic and not supported by robust scientific evidence. Other nutrition experts in the field have expressed similar concerns <sup>ii</sup>. Given these limitations, national regulation and the policies based on these approaches could, in fact, negatively impact nutrition and health and mislead consumers about their food choices.

Dairy products, some of which might be considered “ultra-processed,” have been shown to be an integral part of a healthy diet, delivering key sources of numerous essential nutrients and supporting multiple positive health outcomes <sup>iii</sup>. Policymakers should consider the following limitations of processing-based ranking systems, which lack scientific justification and are not evidence-based before adopting any policies based on them. Systems such as NOVA fail to recognise and/or consider:

- evidence-based dietary guideline recommendations that encourage the consumption of many dairy foods and ingredients <sup>iv</sup>;
- the mandated fortification of some processed products to prevent deficiency and improve population health outcomes (e.g., vitamin D, vitamin A, folic acid, iodine, and iron);
- the complex interactions of nutrients and other components within a whole food (e.g. the entire dairy food matrix);
- the positive contributions of food processing, formulation and additives in ensuring the safety, nutritional adequacy, quality, preservation and extended shelf-life of food
- the importance of:
  - reducing food waste and food losses for sustainability
  - affordability; and
  - the need to feed a growing global population.
- that homemade foods (often with more than 4 ingredients), may not differ from the same foods manufactured by a food business that would be classified as processed or ultra-processed foods.

IDF supports dietary recommendations that deliver meaningful public health outcomes and enable consumers to balance their diet with appropriate food choices, in line with national and international dietary guidelines. Above all, a holistic approach is preferred and should be promoted rather than one that reduces foods to their degree of “processing” and ignores the many benefits that “processing” offers.



Dairy products are widely recognized as an integral part of a healthy diet and key source of essential nutrients. Any simplistic and non-scientifically justified approach to dietary guidance or food ranking focussing on the degree of processing of a food is likely to result in the exclusion or avoidance of nutrient-dense, beneficial foods and ingredients, including many dairy products<sup>v</sup>. Examples include: milk drinks with additional proteins, vitamins and minerals; fermented and cultured dairy products, such as cheese, yogurt, kefir, and doogh; nutritious and bio-active dairy-derived ingredients obtained by processing such as casein, whey protein, lactose, and lactoferrin.

In conclusion, dairy foods are nutritious, affordable, safe foods for consumers around the world, and have demonstrated, long-term positive impacts on the human health, regardless of their level of processing. Nutritional ranking of foods, according to the extent of processing is arbitrary, not supported by scientific evidence, often contradictory, not appropriate for policy making, and could have a detrimental impact on the consumer's selection of nutritious foods. Therefore, IDF strongly opposes using processing-based food ranking systems as a way to encourage healthy diets. Dietary guidance, national policies or international standards that rank the healthfulness of foods must be built upon robust scientific evidence demonstrating they will lead to positive health outcomes without any significant negative effects. NOVA as well as other processing-based ranking systems fail to meet these essential requirements.

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<sup>i</sup> The NOVA classification system classifies foods into categories based on a number of ingredients, type of processing and use of (some) food additives.

<sup>ii</sup> Jones, J. (2019). Food processing: Criteria for dietary guidance and public health? *Proceedings of the Nutrition Society*, 78(1), 4-18.; Gibney MJ. Ultra-Processed Foods: Definitions and Policy Issues. *Curr Dev Nutr*. 2018;3(2).

<sup>iii</sup> Milk and dairy foods are well-known for being naturally nutrient rich, providing an abundant supply of in particular high-quality protein, calcium, phosphorus, potassium, iodine, and vitamins B2 and B12. The unique package of essential nutrients contained within dairy products contributes to the prevention of all forms of malnutrition. A growing evidence base supports no or an inverse association between the intake of dairy products and the incidence of obesity, type 2 diabetes, stroke, certain cancers and cardiovascular disease.

<sup>iv</sup> FAO database shows 83 countries including dairy recommendations in their dietary guidelines: <http://www.fao.org/nutrition/education/food-dietary-guidelines/home/en/>

<sup>v</sup> Jones, J. (2019). Food processing: Criteria for dietary guidance and public health? *Proceedings of the Nutrition Society*, 78(1), 4-18; Vergeer L, Veira P, Bernstein JT, Weippert M, L'Abbé MR. The Calorie and Nutrient Density of More- Versus Less-Processed Packaged Food and Beverage Products in the Canadian Food Supply. *Nutrients*. 2019;11(11):2782.