

Brussels, 29 June 2021

European specialised nutrition wishes to contribute to the growth of organic market in Europe

Specialised Nutrition Europe (SNE), the voice of the specialised nutrition industry¹ in Europe, reiterates its support for the EU Farm to Fork strategy. We are committed to working towards a more sustainable food system that responds to consumers' demand for high quality and more environmentally friendly food and we believe organic farming and processing of organic products is a major means to achieve this.

However, under current EU legislation for many specialised nutrition categories,² the European organic legislative framework does not facilitate the production and marketing of organic products. Our products are mainly intended for consumers with specific nutritional needs (e.g. people with medical conditions and/or specific nutritional needs, infants and young children, sportsmen and women etc.) so specialised nutrition foods are complex products to which vitamins, minerals, and other substances – which do not exist in organic forms - are very often added and/or required by EU legislation. Existing legislation therefore limits our ability to provide customers with an organic product option as we cannot use non-organic alternatives for many nutrients.

Specialised Nutrition products can use organic ingredients and if all specialised nutrition categories had the possibility to be organic (within the 95% rule), our sector could be an important contributor in the European Organic Agenda.

In addition, the current legislation puts EU specialised nutrition manufacturers at a trading disadvantage when in competition with non-EU countries. Third countries with more flexible organic legislation are able to manufacture and export to other third countries (and the EU³) while EU companies cannot. This seems to be at variance with the EU's desire to export 25% of organic products to third countries by 2030, also considering that specialised nutrition sector is the third largest contributor to EU exports⁴.

This disadvantage also impacts the EU research and development for our sector when compared to third countries with more flexible organic legislation by discouraging innovation in the specialised nutrition organic field, when the EU specialised nutrition sector is normally at the forefront of innovation in nutritional science.

SNE calls upon European decision-makers to introduce the necessary rules to support the formulation, production and marketing of all organic specialised nutrition products, acknowledging a growing interest in organic products in the European Union resulting from consumer preferences and individually motivated by interests in health, the environment and sustainability and reflected in the EU policy agenda.

¹ Specialised nutrition products are infant and follow-on formula, processed cereal-based food and baby food, food for special medical purposes, total diet replacements, young child formula, meal replacements, sport food and gluten-free food.

² With two exemptions granted for infant and follow-on formula, processed cereal-based food, and baby food, according to Annex II, Part IV, point 2.2.2.(f) of Regulation (EU) 2018/848

³ When there is a bilateral equivalence arrangement

⁴ FoodDrinkEurope2020, p.21, available at <https://www.fooddrinkeurope.eu/wp-content/uploads/2021/02/FoodDrinkEurope-Data-Trends-2020-digital.pdf>

SNE is committed to continuing to bring value to Europe and its citizens, but we need the support of European decision-makers to allow the production of organic specialised nutrition and thus, to contribute to the growth of the organic market for organic food, directionally the trends in consumer demand and European Commission's 'organic' goal.

[Specialised Nutrition Europe \(SNE\)](#) is the voice of the specialised nutrition industry across Europe. SNE members are the national associations of 19 European countries including most EU member states, and their members are the companies producing tailor made dietary solutions for populations with very specific nutritional needs. These include infants and young children, patients under medical supervision, sportspeople, overweight and obese consumers, and those suffering from coeliac disease.