



European Federation of Associations
of Health Product Manufacturers

2024-2029 *Manifesto*



*Together for healthy citizens
and a prosperous economy
in the EU*

0 2024-202





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Contributing to optimal nutrition, food supplements are allies in supporting European citizens' health and well-being. With over 3.000 companies operating in the EU and sustained growth delivered in recent years, the food supplement sector is an important contributor to the EU's economy and society.

Ahead of the European Elections in June 2024, we call on the EU to recognise food supplements as important allies for European citizens' health, and to promote policies that empower consumers, and enable the continued growth of the European food supplement sector in the next mandate.



FOOD SUPPLEMENTS AS ALLIES FOR EUROPEAN CITIZENS' HEALTH

- Food supplements are concentrated sources of nutrients, vitamins, minerals or other substances, with a nutritional or physiological effect¹, helping people reach an optimal nutritional intake by “supplementing” their diet².
- Regulated as foodstuffs, they are not meant to prevent or treat any disease, nor to replace a balanced diet.
- Together with a healthy lifestyle, they contribute to maintaining and improving citizens' health and/or reducing risks factors of developing certain diseases.
- Considering the EU's rapidly ageing population³, and the related increase of non-communicable diseases (NCDs)⁴, food supplements play a key role in reducing the financial burden on European healthcare systems^{5 6}.

¹ EFSA, Food Supplements

² EHPM, Food Supplements

³ Eurostat (2024), Ageing Europe
- statistics on population
developments

⁴ European Commission (2022),
“Healthier Together: EU Non-
Communicable Diseases
Initiative”

⁵ Frost & Sullivan (2022),
“Supplements to Savings”

⁶ Synadiet (2019), “Les
compléments alimentaires, au
service du bien-vieillir”



A VIBRANT SECTOR COMMITTED TO THE EU'S PROSPERITY AND GROWTH

- The European food supplement sector rose to the challenges posed by COVID-19, international instability and the global economic slowdown, delivering sustained growth in the recent years with a Compounded Annual Growth Rate (CAGR) of over 6% since 2014⁷.
- The sector was worth approximately EUR 18bn in 2023, with over 3.000 companies creating over 100.000 jobs, contributing significantly to the EU's economy^{8 9}.
- The sector is deeply connected to European society, as most food supplement companies are small and medium-sized enterprises (SMEs) that contribute to the vitality and cohesion of local communities.

7 Monitor Deloitte for Synadiet (2020), "A case for an EU reform of the food supplements regulation to support industry competitiveness"

8 Monitor Deloitte for Synadiet (2020), "A case for an EU reform of the food supplements regulation to support industry competitiveness"

9 IADSA (2023), "Vitamin and dietary supplement (VDS) global market overview: 2023"

Guiding principles *for the EU's* *2024-2029* *mandate*

Ahead of the start of the new political cycle 2024-2029, it is critical for policymakers, stakeholders and industry to join forces and agree on guiding principles to drive policy initiatives that recognise the value of food supplements, contribute to public health goals, empower consumers and further unleash the potential of the European food supplement sector.



We are committed to working closely with EU policymakers and stakeholders to ensure that policy initiatives put forward in the EU's 2024-2029 mandate...

1

EMPOWER EUROPEAN CONSUMERS

- European consumers should be able to make informed choices on safe food supplements through clear labelling that provides transparent information.
- EU policymakers, regulators and stakeholders should work closely together to tackle the growing flow of false myths and fake news on food supplement that circulates online, misleading consumers and damaging the reputation of the sector.
- EU policymakers and stakeholders should strive to increase awareness on the importance of including food supplements within the daily nutritional scheme as part of a healthy lifestyle, taking into accounts the unbalanced dietary habits of EU citizens¹⁰. This is even more important for sensitive consumer groups, in line with recommendations of national health bodies and nutritional professional associations.



2

SUPPORT EUROPE'S ECONOMIC GROWTH AND INNOVATION

- EU policymakers, regulators and stakeholders should agree on harmonised standards and best practices on food supplements' quality and safety to create a better and more predictable regulatory environment for food supplements.
- EU policymakers and regulators should ensure fair competition among Member States, ensuring the smooth operation of the internal market, while also protecting European consumers and the European food supplements sector from unfair competition from countries with less strict rules.
- EU policy makers and regulators should foster a predictable regulatory framework that enables continued investments to meet the evolving demands and needs of European consumers.



3

STEM FROM TRANSPARENT DIALOGUE AND CONSULTATION WITH STAKEHOLDERS

- Transparent dialogue between EU policymakers is crucial to creating mutual trust and lead to informed and evidence-based policymaking.
- Upcoming policy initiatives should be based on sound impact assessment and in depth consultations with stakeholders.
- EU policymakers should facilitate a platform for discussion between all stakeholders involved in the food supplement sector to co-create solutions that improve the regulatory environment for food supplements in the EU, for the benefit of consumers and industry.

Key policy asks



Building on our suggested guiding principles outlined, specific action is needed across a number of policy initiatives that have the potential to have profound impact on European consumers and the food supplement sector.



In the EU's 2024-2029 mandate, we call on the EU to...

SETTING OF MINIMUM AND MAXIMUM LEVELS FOR VITAMINS AND MINERALS

We call on the EU to...

- Promote and support the adoption of a fair and practical model that it is scientifically sound and that takes into account existing national approaches, consumers' choices and habits, and the impact on the food supplements sector.
- Ensure that the development of any new models is informed by a thorough impact assessment and genuine consultation with stakeholders.

Read our full position on Setting of minimum and maximum levels for vitamins and minerals [here](#)

NOVEL FOODS

We call on the EU to...

- Create legal certainty and address interpretation issues on the implementation of the Novel Food Regulation and on what constitute a novel food.
- Address the current fragmented and heterogeneous application of the regulation, which hinders innovation and companies' ability to plan investments in this area.

Soon to be published on the EHPM website



APPLICATION OF ARTICLE 8 REGULATION (EC) 1925/2006

We call on the EU to...

- Recognise the Article 8 of Regulation (EC) No 1925/2006 as an important safety assessment procedure, rather than a tool to establish a negative list of botanicals.
- Take risk management decisions that are proportionate to the level of the identified risks, and ensure that the application of the precautionary principle does not have the undesirable effect of limiting consumers' access to food supplements that can contribute to maintaining or improving their health.

Soon to be published on the EHPM website

BOTANICAL HEALTH CLAIMS

We call on the EU to...

- Promote a fair and practical model to the assessment of botanical health claims currently 'on hold', taking into account tradition of use but also innovative science.
- Adopt a graded approach that takes into account both botanical health claims' tradition of use and innovation, as well as the specificities of botanicals used in food.

[Read our full position on Botanical Health Claims here](#)



PROBIOTICS

We call on the EU to...

- Address the lack of a harmonised and proportionate approach to the probiotics market, which creates barriers within the internal market, unfair competition for food supplements operators, as well as an unequal treatment between European consumers in different countries.
- Support Member States' initiatives that allow the use of the term "probiotics" as a category and foster their uptake across the EU.

Soon to be published on the EHPM website

EUROPEAN POST-MARKET VIGILANCE SYSTEM

We call on the EU to...

- Acknowledge that post-market vigilance is already applied by most of the companies in the food supplement sector;
- Welcome National and Industry best practices.

Read the EHPM Guidelines on Adverse Events reports [here](#)

About EHPM



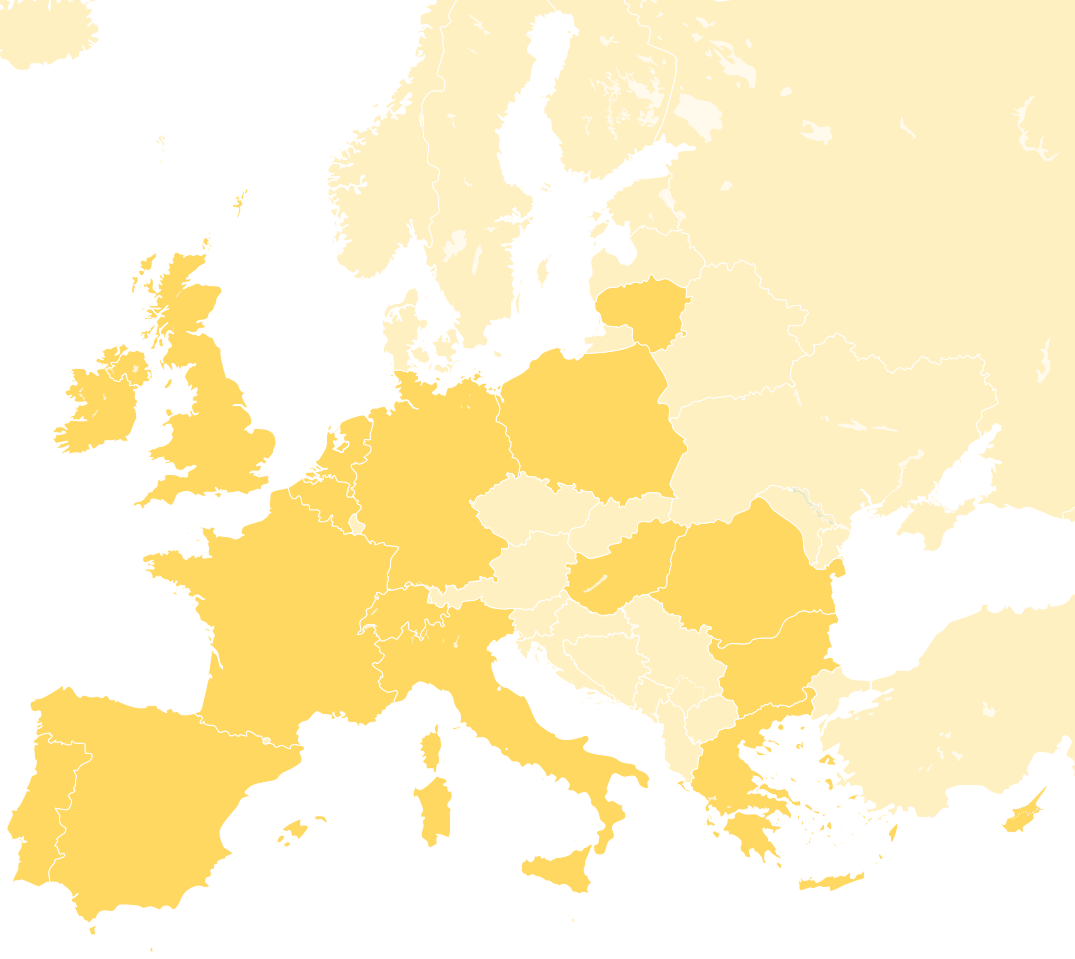
The European Federation of Associations of Health Product Manufacturers (EHPM) was created in 1975 and, since then, has been the voice of the food supplement sector in Europe.

Through our Members, we aim to provide consumers with safe, science-based, high-quality products as well as accurate and helpful information about their nutritional value and use. EHPM's focus is on securing a workable regulatory structure for these companies.

Since 2022, EHPM has been a member of FoodDrinkEurope, the biggest European association representing the food and drink sector. We believe that uniting our forces is very important to address the ongoing challenges faced by the food supplement sector.

EHPM help develop solutions to improve the EU regulatory framework for food supplements through our technical working groups. We establish and promote industry best practices for product quality, safety and efficacy.

EHPM cooperates actively with the European Commission, the European Parliament, national governments, relevant trade associations and consumer groups, leading scientists and international contacts to reach consensus on appropriate EU legislation for food supplements that prevents barriers to trade and ensure consumer choice.



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**NATIONAL
ASSOCIATION
MEMBERS**

12

**MEMBER
COMPANIES**

1.600

**PRODUCT
MANUFACTURERS
AND DISTRIBUTORS,
THE MAJORITY OF
WHOM ARE SMEs**



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