

Brussels, 15 October 2025

Mr. Olivér Várhelyi
Commissioner, Health and Animal Welfare
European Commission

Ms. Sandra Gallina
Director-General, DG Health and Food Safety
European Commission

Mr. Antonio Parenti
Director DG SANTE B – Public health, Cancer and Health
European Commission

Subject: Our Suggestions for a Holistic and Effective EU Cardiovascular Health Plan

Dear Commissioner Olivér Várhelyi,

We congratulate the Commission on its commitment to developing the Cardiovascular Plan and for providing stakeholders the opportunity to contribute through the recently closed public consultation. We remain at your disposal to provide further ideas and support as the process advances.

Cardiovascular diseases remain among the leading causes of death in Europe and worldwide. Addressing them is therefore not only a moral duty, but also a social and economic necessity, fully aligned with the Union's mission to promote the health and rights of its citizens and to enable balanced, fulfilling lives.

Obesity and Cardiovascular Diseases Are Multifactorial

The most recent scientific evidence shows that nutrition is only one of several causes of obesity, itself a major risk factor for cardiovascular disease. Other drivers include genetics, metabolism, microbiota, socio-economic and environmental conditions, mental health, and, most critically, the lack of physical activity.

As was brilliantly underlined at the Fourth High-level Meeting of the UN General Assembly on the Prevention and Control of Noncommunicable Diseases and the Promotion of Mental Health and Well-being by the Hungarian Government's representative, sedentary behavior is one of today's greatest public health threats.

For millions of years, humans have burned large amounts of calories through movement, play, and work. Yet over the past seventy-five years, agriculture, urbanization, automation, and now AI and the Internet of Things have drastically reduced our daily energy expenditure. Without a societal shift, this trend will only accelerate. Paradoxically, while access to calories has never been easier, we burn



fewer of them. Unless action is taken, balancing calorie intake and expenditure will become impossible.

That is why we believe it is essential to move beyond the usual narrative, focused almost exclusively on reducing calorie intake, and to embrace a more holistic approach that also promotes burning calories through sport and physical activity at all ages. We would welcome the opportunity to work with the Commission in shaping policies and initiatives that foster walkable cities, active schools, mobility-friendly workplaces, and a broader culture that favors movement over sedentary lifestyles.

Why Taxes, Front-of-Pack Labels, and UPFs Are the Wrong Focus

We believe the Cardiovascular Health Plan should avoid repeating approaches that have already proven ineffective. Restricting single nutrients such as sugar, fat, or salt through taxes or warning labels has proven obsolete, ineffective, and counterproductive. Data show that obesity and NCDs rates continue to rise in countries that have adopted such measures. Limited reductions in consumption are debatable and, in any case, have not translated into meaningful prevention, clear proof that the problem lies elsewhere.

Health taxes, presented as quick fixes, have in fact turned into simplistic political shortcuts incapable of addressing the true complexity of obesity. Rather than reducing calorie intake, they have penalized consumers with higher prices and added inflationary pressure.

Similarly, interpretative front-of-pack (FoP) labelling has failed to produce meaningful public health outcomes while producing unintended harm for consumers and businesses. Designed mainly to shift preferences, these schemes have not improved dietary choices. Instead, they stigmatize individual nutrients without reducing obesity or NCD rates, penalize traditional foods and cultural heritage, and distort fair competition. Moreover, FoP systems remain a one-size-fits-all approach, no longer appropriate in an era where technology enables personalized nutrition and lifestyle solutions through apps and AI agents.

We therefore urge the Commission to explore more effective approaches that consider portion size, frequency, variety, and the broader lifestyle context.

Similarly, we warn against policies targeting so-called ultra-processed foods (UPFs). The concept is vague, inconsistently applied across countries, and lacks scientific consensus. No scientifically valid or widely recognized definition exists, and the NOVA classification relies mainly on low-quality observational studies with results rarely reaching statistical significance. Pursuing an EU-specific definition would only create confusion, fuel bureaucracy, and discriminate against foods that are safe and, in moderation, part of a balanced lifestyle.

No individual ingredient or product can be blamed for the obesity epidemic: true drivers are portion size, frequency, and variety. Moreover, the food processing industry plays a crucial role in ensuring global food security, safety, and waste reduction.

We therefore encourage the Commission to avoid this linguistic trap and to move beyond demonizing nutrients (when deemed safe by EFSA) or food processes.

A New Paradigm: Empowerment and Balance

Rather than repeating outdated policies, Europe has the great opportunity to lead by embracing a new paradigm that empowers citizens to live balanced lives, before other global actors such as the US or China take the initiative. This involves investing in education, supportive environments, and technologies that help individuals make informed choices and adopt healthy lifestyles, integrating movement, mental well-being, and mindful meals.

The Mediterranean diet exemplifies this balance: supported by robust scientific evidence, it reduces the risk of cardiovascular disease by 30-45%. It is not a mere list of foods or recipes, but a holistic



lifestyle that integrates nutrition, physical activity, and mental health. Similar patterns exist in other traditional diets worldwide, such as the Japanese diet, which shares principles of moderation and balance. These models can be promoted across the Union, with technology playing a key role in helping citizens embrace and sustain equilibrium.

AI and wearable devices now make personalized nutrition and lifestyle achievable, offering great prevention opportunities. Yet these tools must be applied carefully, as they also pose risks if misapplied or poorly regulated. Citizens should be supported in adopting personalized, balanced lifestyles, not pushed into one-size-fits-all restrictions.

Our recommendation

We therefore invite the Commission to:

- Focus the Cardiovascular Health Plan on holistic, evidence-based strategies promoting a balanced lifestyle, inspired by proven models such as the Mediterranean diet, rather than outdated fiscal or labelling measures.
- Avoid pursuing a definition of UPFs that lacks scientific consensus and risks creating major unintended consequences.
- Promote physical activity, play, and active living as essential pillars of cardiovascular prevention.
- Empower citizens with knowledge, technology, and supportive environments that enable them to choose a balanced diet and lifestyle.

Europe has the chance to lead with an innovative, science-based approach. We stand ready to contribute our expertise and to support the Commission in building a plan that promotes health, respects citizens' freedom of choice, and strengthens Europe's cultural and economic vitality.

We remain at your full disposal to provide innovative ideas and to answer any questions you may have.

Your sincerely,

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