

Brussels, 27 Novembre, 2025

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

Subject: Ensuring an Evidence-Based and Empowerment-Oriented EU Strategy on Cardiovascular Health

Dear Commissioner Várhelyi,

We would like to express our appreciation for the significant effort and ambition the Commission is devoting to the forthcoming EU Cardiovascular Health Plan. Given the scale of the challenge – medical, social, and economic – we fully recognise the importance of developing a comprehensive EU strategy capable of reducing the burden of CVDs for both current and future generations.

In recent weeks, several public reports and news items have circulated about the direction of the upcoming initiative. It is precisely in light of this ambition, and the expectations now emerging in the public domain, that we wish to share a number of constructive considerations – ensuring that the final strategy reflects the strongest possible scientific basis, avoids unintended consequences, and supports a preventive model centred on knowledge, responsibility, and empowerment.

The importance of grounding the initiative in robust evidence

We trust that the Commission will take particular care in ensuring that the strategy fully reflects the complexity of the causes of CVDs. While nutrition plays a role, scientific evidence does not justify reducing the problem to a narrow set of nutrients or food elements.

We therefore hope that the initiative will:

- **Consider the full range of determinants**, including socio-economic factors, metabolic conditions, environmental exposures, and especially the **sharp decline in physical activity and free play**, and energy expenditure, particularly among children and adolescents, which is strongly associated with rising rates of obesity, diabetes, and CVDs;
- **Avoid drawing misleading parallels**, as seen in certain global narratives, between individual nutrients (e.g., saturated fats, sugar, salt) and tobacco. Science does not support such equivalences, and maintaining a clear distinction is crucial for public trust.

Avoiding ideologically driven simplifications

Public health interventions are most effective when grounded in evidence, proportionality, and the principles of Better Regulation. We encourage the Commission to remain vigilant against the risk, often present in public and political debate, of reducing complex metabolic and behavioural dynamics to single-nutrient or single-category narratives. Such simplifications can unintentionally pave the way



for ideologically driven approaches or political shortcuts, such as fiscal measures that fail to reflect the scientific complexity of cardiovascular risk.

Regulatory measures should avoid distorting markets, penalising safe, traditional, or culturally significant products, or restricting individual freedom of choice. They should be supported by a rigorous impact assessment capable of identifying unintended economic, social, and cultural consequences. Clarity, scientific rigour, and genuine consumer empowerment must remain the guiding principles of any EU action in this area.

Learning from international and European experiences with fiscal measures

We appreciate the Commission's openness to exploring a variety of policy tools. However, evidence accumulated over the past decade, both internationally and within the EU, shows that **fiscal measures have limited and inconsistent effects** on long-term behaviour. Experiences such as the **Danish fat tax**, as well as sugar-tax schemes in Europe and beyond, demonstrate that such measures tend to generate substitution effects, cross-border shopping, unintended social regressivity, disproportionately affecting lower-income households, and limited or no measurable improvements in population health.

These instruments also risk becoming tools of **social engineering**, designed not only to discourage certain products but also to **pressure companies into specific reformulations**. Such pressure undermines innovation and reduces food diversity. The evolution of food products should arise from **consumer choice, market dynamics, and voluntary industry innovation**, not top-down mandates.

For these reasons, we hope that any fiscal considerations will be carefully weighed against available evidence, proportionate to the objective pursued, and fully aware of their limited effectiveness and significant unintended consequences.

Likewise, we trust that no attempts will be made to introduce product-classification systems, whether physical (on-pack) or digital (via apps), or any tool that risks stigmatising specific nutrients, ingredients, or processing levels. European experience has shown that such schemes are outdated, overly simplistic, and often increase consumer confusion rather than improving dietary habits. Emerging evidence also suggests that these systems can inadvertently promote undernutrition, encouraging consumers to avoid nutrients that are otherwise essential.

Preventive action should move beyond these obsolete approaches and instead prioritise education, empowerment, and innovation, promoting balanced diets grounded in variety, frequency, and portion awareness.

We are confident that the Commission will continue to **pursue a holistic, consumer-centred approach, one that empowers individuals rather than constrains them**; avoids new bureaucratic structures for scoring foods; and steers clear of new taxes or indirect pressures to reformulate. **Public health is best served when citizens are equipped with knowledge and tools, and when markets can innovate freely in response to informed consumer preferences.**

Beyond top-down approaches: promoting balanced lifestyles through education and personalised tools

In our view, a sustainable, effective approach to CVDs prevention does not lie in restrictive or "one size fits all" behavioural prescriptions. Instead, it rests on two pillars:

1. Education and health literacy: A balanced lifestyle is the outcome of knowledge, awareness, and informed decision-making. We encourage the Commission to place substantial and dedicated emphasis on:

- school-based education on food, movement, and well-being;
- initiatives that promote **free play and physical activity** among children;



- workplace programmes fostering healthier daily routines;
- accessible tools to strengthen citizens' understanding of nutrition and health.

2. Precision nutrition and personalised prevention: Technologies now widely available to European citizens – **wearables, lifestyle apps, AI-driven personalised feedback systems** – offer unprecedented opportunities to support behavioural change, monitor cardiovascular risk and empower individuals to take responsibility for their health.

These tools are fully aligned with Europe's digital transition and avoid the pitfalls of paternalistic or prescriptive approaches. We hope the Commission will fully leverage this potential.

A constructive appeal

Our intention is not to criticise but to contribute to a strategy that is scientifically robust, socially balanced, economically sound and genuinely effective.

An EU initiative on CVDs can become a global benchmark, **provided it avoids shortcuts** such as unproven fiscal penalties and refrains from targeting single ingredients or ideologically framed narratives.

A prevention model based on **empowerment, education, personalised tools and a full understanding of the multifactorial nature of CVDs** would place Europe at the forefront of public health innovation.

We stand ready to contribute evidence, analysis and proposals, and would welcome the opportunity to exchange views with your team at your convenience.

Best regards,
Pietro Paganini