Brazil Declares War on “Ultra-processed” Products

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The Brazilian Ministry of Health recently published its *Dietary Guidelines For The Brazilian Population*. For most food and beverage industry players, these will not be an enjoyable read – the Brazilian government is coming down hard on processed foods and beverages, and the darkest corner of the doghouse, it seems, is reserved for health and wellness-positioned products, including better-for-you (BFY) offerings.

**Fresh good, processed evil**

Brazil, like other emerging economies, has experienced a profound shift in terms of public health. Instead of infectious diseases and health complications arising from poverty and malnutrition, it is now non-communicable chronic diseases that are the leading cause of death among Brazilian adults. According to Brazil’s Ministry of Health, one in two adults and one in three children are now overweight.

Seeking to address this issue, the Brazilian Ministry of Health issued a new set of dietary guidelines, filling 154 pages, this autumn. It is the first update since *Promoting Healthy Eating*, published in 2006. The new guidelines place great emphasis on fresh, unprocessed foods, including fruits and vegetables. This, in itself, is hardly contentious. What the industry might find unpalatable, however, is the guidelines’ outright hostility towards packaged foods, regardless of their nature.

To illustrate, the document’s *Ten Steps to Healthy Diets* advise consumers to “limit consumption of processed foods” and to “avoid consumption of ultra-processed foods”. By “processed foods”, the Ministry of Health is referring to items such as bread, cheese and bacon as well as canned fruits, vegetables and fish.

Among the “ultra-processed foods”, which it considers “nutritionally unbalanced” and which it doesn’t want its population to consume, are soft drinks, sweetened breakfast cereals, cereal bars, sweetened and flavoured yoghurts and dairy drinks, and also breads that contain anything other than wheat flour, yeast, water and salt. In fact, any product containing more than five ingredients should be avoided. The
guidelines specifically mention a number of undesirable ingredients, such as soy and milk proteins and protein isolates.

As for health and wellness-positioned products, the Ministry of Health shows no mercy. It cautions consumers that “ultra-processed foods are often reformulated and advertised as if they are healthy, being labelled as, for example, ‘light’ or ‘diet’ or low in fat or sugar, or free from trans fats, or high in fibre or vitamins and minerals”.

It goes on to say that reformulation may improve products, but that these, nevertheless, remained ultra-processed and, ergo, unhealthy, and that they certainly were not good alternatives to natural or minimally processed foods. Furthermore, the guidelines state that “ultra-processed foods' means of production, distribution, marketing and consumption damage culture, social life and the environment”.

**Brazil’s health and wellness market has been booming, until now**

Harsh words indeed, and worrisome for a market as important and dynamic as Brazil. Our latest data shows that Brazil is the world’s fourth largest market for health and wellness-positioned packaged foods and beverages after the US, China and Japan, accruing retail value sales of US$35.2 billion in 2014. A value growth gain of 14% in 2014 ranks Brazil as the eight most dynamic market for health and wellness products this year.

BFY foods and beverages, which are “dissed” by the new guidelines in one fell swoop, account for 20% of the value sales garnered by health and wellness-positioned products, while naturally healthy (NH) high-fibre foods, many of which contain more than five ingredients, made up 15% in 2014.

NH snack bars, which saw value sales leap from US$157.6 million in 2009 to US$451.6 million in 2014, are exceedingly popular with Brazilian consumers, as are health and wellness-positioned breakfast cereals, which managed to double their value sales over the same time period.

**A need for dialogue**

Like snack bars, breakfast cereals get very short shrift indeed. They don’t even feature as a component of the eight different breakfast examples purported as healthy choices in the document. It is arguable whether an oat-based breakfast cereal made with low-fat milk and served with fruit, for example, isn’t, in fact, healthier than the guidelines’ suggestion of “orange juice, French bread with butter and papaya”, which is virtually devoid of protein as well as fairly low in fibre.

Although arguably well intentioned from the outset, it is questionable whether Brazil’s Ministry of Health is really doing its population a big favour by tarring everything that can’t be bought in a traditional wet market with the same brush. A focus on fresh whole foods is one thing, but the vilification of everything that is fortified and/or reformulated with the objective of offering a healthier choice runs contrary to consumer demand for healthy convenience.
The reality is that Brazilian consumers, especially those living in the country’s expanding and busy urban centres, are highly unlikely to return to cooking three meals a day from scratch. But many, led by official healthy eating advice, may turn their back on products carefully formulated to be low in fat, sugar or salt, high in fibre, or those that can help with lowering cholesterol levels. Also, child malnutrition remains rife in Brazil, but products fortified with vitamins and minerals aimed at youngsters, such as biscuits, milk drinks and snack foods, are suddenly to be held in “ultra-processed” disgrace, which is bound to put off parents.

Companies developing these kinds of products will have a very hard time indeed educating consumers against explicit advice emanating from their own government. The only way to ameliorate the situation is for the industry and food scientists to engage with the government in order to bring about a reconsideration of its rigid black-and-white approach to healthy eating.

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