GLOBAL DAIRY PLATFORM

Perspective Paper

Processed Foods, Dairy, and Dietary Patterns

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KEY TAKEAWAYS:

- Diet-related non-communicable diseases represent a major and growing public health challenge.
- Dairy foods are heterogeneous: many contribute to healthy dietary patterns and nutrient adequacy, while others are discretionary; their public health relevance depends on how they function within overall dietary patterns.
- Policies to reduce ultra-processed food consumption must be designed to safeguard nutrient adequacy, affordability, and equitable access to healthy diets to avoid unintended public health consequences.

The global rise of non-communicable diseases (NCDs) represents one of the most pressing public health challenges of the 21st century. A substantial and growing body of epidemiological, mechanistic, and clinical evidence links poor diet quality and excessive energy intake to increased risk for NCDs across the life course. A recent ***Lancet* series on ultra-processed foods (UPFs) and human health** synthesizes evidence to make a case for urgent, government-led policies to halt and reverse the displacement of long-established dietary patterns based on fresh and minimally processed foods by ultra-processed alternatives.

The dairy sector shares many of the objectives outlined in the *Lancet* series, including improving population diet quality, reducing NCDs, addressing health inequities, and reshaping food systems to prioritize both human and planetary health. The central policy challenge now confronting governments is how to design interventions that effectively reduce dietary harms while safeguarding nutrient adequacy, affordability, and access to healthy diets, particularly for vulnerable populations already facing food and nutrition insecurity.

Within this context, certain food categories, such as dairy, warrant closer examination because of their heterogeneity, nutritional contribution, and established role within healthy dietary patterns. According to the **Nova classification system**, the most widely cited UPF classification system for foods, dairy products span multiple designations, from minimally processed to ultra-processed formulations.[1]

This GDP Perspective Paper examines how dairy foods contribute to improved diet quality and human health, and how policy approaches aimed at reducing UPF consumption can remain faithful to the core objectives of the *Lancet* series while avoiding unintended consequences that may undermine nutrition and equity goals.

Dairy is versatile, not a processing category

The Nova classification system has been instrumental in shifting attention from individual nutrients to the degree and purpose of food processing, highlighting how industrial formulation

and profit-driven product design can shape dietary patterns and health outcomes.[1] At the same time, like all classification systems, Nova encompasses considerable heterogeneity within categories. This is particularly evident for dairy.

Across food systems globally, dairy foods span several Nova groups. Examples include:

- Unprocessed or minimally processed foods (Nova 1): fresh milk, plain yogurt, kefir
- Processed culinary ingredients (Nova 2): butter
- Processed foods (Nova 3): many traditional cheeses
- UPF (Nova 4): sweetened dairy beverages, flavored yogurts, dairy-based desserts

The public health implications of these products differ not only because of their processing characteristics, but also how they function within dietary patterns. The *Lancet* series emphasizes that UPFs are rarely consumed in isolation and that adverse health outcomes are primarily associated with dietary patterns dominated by UPFs, in which whole and minimally processed foods and meals are displaced by industrially formulated ultra-processed alternatives.

Applying this dietary pattern lens to dairy suggests that policy relevance depends less on categorical classification alone and more on whether specific products contribute to, or mitigate, dietary displacement. In this sense, dairy is not a single processing category but a diverse food group whose public health implications depend on context, composition, and use within the diet.

Dairy's contribution to nutrient adequacy and public health outcomes

From a population health perspective, dairy foods have long been recognized as significant contributors to nutrient adequacy in many regions. Milk, cheese, and yogurt provide high-quality protein and are among the principal dietary sources of calcium, iodine, and vitamin B12, and – where fortified – vitamin D. These nutrients are frequently under-consumed globally and are essential across the life course, particularly for pregnant women, children, adolescents, and older adults.[2]

Dietary pattern analyses cited in the *Lancet* series indicate that **diets lower in UPFs and higher in minimally processed foods are associated with improved nutrient profiles and reduced risk for NCDs**.[3] Within such dietary patterns, dairy foods are commonly included and contribute to nutrient adequacy without driving excessive energy intake. The *Lancet* series also notes that pooled risk estimates for high versus low UPF intake are similar in magnitude, but inverse in direction, to the protective effects observed for established healthy dietary patterns such as the Mediterranean diet, which typically includes moderate amounts of dairy.[2]

These observations do not argue for exempting dairy foods from public health scrutiny. Rather, they highlight that many dairy foods measurably advance the same objectives that UPF reduction policies seek to achieve, including improved nutrient intake and healthier dietary patterns. Recognizing that nutrient-dense foods such as dairy are part of the solution is therefore critical for ensuring that policies designed to reduce UPF consumption do not inadvertently compromise nutrient adequacy, particularly in vulnerable populations already at risk of dietary inadequacy.

Policy design and risk of unintended consequences

The **second paper** in the *Lancet* series proposes a comprehensive suite of government-led policies to halt and reverse the rise of UPFs, including fiscal measures, marketing restrictions, procurement standards, and reforms targeting food environments and corporate practices.[4] The policy paper also explicitly acknowledges that in settings where UPFs dominate and affordable alternatives are scarce, applying broad policies to all UPFs could harm populations that are reliant on them.[5] This caution is directly relevant for heterogeneous food categories, such as dairy.

Policies that do not distinguish between discretionary indulgent UPF and nutritionally meaningful foods risk several unintended consequences, including reduced intake of essential nutrients, increased diet costs, and disproportionate impacts on low-income households. These concerns align with the *Lancet* series' emphasis on equity and the need to ensure that transitions away from UPF-dominated diets do not deepen food insecurity or exacerbate social inequities.

Addressing these risks does not require weakening public health. Rather, it calls for careful policy design that integrates UPF reduction targets with complementary measures to protect access to nutrient-dense foods and to support the availability and affordability of minimally processed alternatives.

Public-private partnership for the greater good

The **third paper** in the *Lancet* series argues that the global expansion of UPFs has been driven in part by the growing economic and political influence of transnational food corporations, alongside coordinated efforts to shape food systems and policy environments that favor ultra-processed diets.[5] These findings underscore the importance of strong public governance, transparency and accountablity in food policy development and implementation.

At the same time, the effective implementation of public health policy targeting food supply chains, procurement systems, and retail environments inevitably requires engagement with private-sector actors, given their central operational role in these domains. The policy challenge, therefore, is not whether industry actors should be involved in food system governance, but under what governance frameworks policies aimed at the food industry are designed, implemented, and montiored.

Clear rules on transparency, accountability, and conflict-of-interest management are essential to ensuring that public-private interactions support, rather than undermine, public health objectives. Framing voluntary action, regulatory oversight, and partnership within robust governance structures can help move policy dabates beyond inclusion-exclusion dynamics and toward practical approaches that prioritize measurable public health outcomes while recognizing implementation realities.

Advancing the right agenda

To strengthen alignment between strategies to reduce UPF consumption and broader nutrition and equity goals, several research and policy priorities warrant attention. Research priorities include:

- Improving evidence on which dairy foods contribute to nutrient adequacy and healthy dietary patterns, and how their role varies across population groups and food system contexts.
- Monitoring of nutrient adequacy outcomes alongside UPF reduction targets, with particular attention to calcium, iodine, and vitamin B12.
- Evaluating policy impacts on diet cost and food access, especially among low-income and food-insecure populations.

Policy design priorities include:

- Developing policy tools that distinguish discretionary, indulgent UPFs from nutritionally contributory foods.
- Integrating affordability and access considerations into UPF reduction strategies, to support equitable transitions toward healthier dietary patterns.

DAIRY LEADERSHIP: A CALL TO ACTION

The dairy sector has an important role to play in supporting evidence-based food policy that advances public health, nutrition, and equity objectives. In the context of growing attention to ultra-processed foods (UPFs), dairy leadership can help ensure that policy responses are informed by current evidence on dietary patterns, nutrient adequacy, and real-world access considerations.

Priority actions include:

- Investment in robust, transparent evidence on how different dairy foods contribute to dietary patterns, nutrient adequacy, affordability, equity, and health outcomes.
- Advocacy for clear differentiation of nutrient-rich dairy foods that make meaningful contributions to the diet in public health policy frameworks, particularly those addressing UPFs.
- Support for policies that improve affordability and access to nutrient-dense foods, especially for populations at greater risk of food and nutrition insecurity.

Advancing this agenda will support more nuanced, evidence-based policy development and help ensure that efforts to reduce UPF consumption deliver measurable improvements in equitable population health.

For more information on the Global Dairy Platform's Perspective Papers, please reach out to Dr. Beth Bradley at beth.bradley@globaldairyplatform.com.

References

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