

The International Probiotics Association Europe (IPA Europe) is deeply committed to promoting the responsible use of probiotics in food and food supplements. IPA Europe asks for an evaluation of the current understanding of the term 'probiotic' in the EU. Also, we believe that clear criteria should be set up to prevent the indiscriminate use of the term 'probiotic' and its potential misinterpretation.



Probiotic food and food supplements have gained significant popularity in recent years, as they contain beneficial microorganisms, typically bacteria and yeast, that are believed to have a positive impact on health when consumed in adequate amounts. These microorganisms have been incorporated into a wide range of products, from yoghurt to dietary supplements, with nutritional and health benefits such as improving gut health, digestion, the immune system and more. However, it is important to note that probiotics, in and of themselves, do not constitute specific health claims.



Current practices for the use of the term probiotic in Europe in labelling and in commercial communication



Probiotic as nutrition claim it is a factual information indicating the name of this category of substances complying with the requirement of NHCR No. 1924/2006 which governs the use of nutrition and health claims on food products.



Probiotic as a general, non-specific health claim that **can be made if accompanied by a specific health claim** (par. 3 art 10 of NHCR No. 1924/2006). This is the case for the health claim "live cultures of yoghurt improve lactose digestion".



Probiotic as a category name, used for food supplements to indicate the categories of nutrients that characterise the product composition, as by Article 6(3).(a) of Food supplements Directive 2002/46/EC (with no references to health effects)

The term 'probiotic' is currently used in Europe and worldwide to describe a category of products and ingredients that share certain characteristics. While some European countries only allow the use of the term probiotic for food supplements, others permit labelling in both food and supplements, and in certain countries, probiotics cannot be labelled at all. This inconsistency creates a challenging landscape for consumers to navigate.



A well-defined framework for the use of the term 'probiotic' in Europe for food and food supplements would benefit consumers and industry stakeholders alike. IPA Europe advocates for the authorities at national and European level to propose clear criteria for the use of the term 'probiotic' on the product and on commercial communication¹. It would foster the proper evolution of Europe's food industry within a fair competitive framework, ensuring that consumers can make informed choices. In light of the increasing number of EU Member States implementing national rules and questioning the use of the term 'probiotic', it is evident that the current position of the European Commission is no longer fit for purpose and should be reconsidered².

¹ IPA Europe and ISAPP open-access paper "Criteria to qualify microorganisms as 'probiotic' in foods and dietary supplements <https://www.frontiersin.org/articles/10.3389/fmicb.2020.01662/full>

² In the EC guidance of 2007 on the interpretation of the nutrition and health claims made on foods, the expression 'contains probiotics' is given as an example of health claim. Since then, the European Commission excludes the possibility of recognition and use the term 'probiotic' in Europe as nutrition claim to describe a category of ingredients https://ec.europa.eu/food/system/files/2016-10/labelling_nutrition_claim_reg-2006-124_guidance_en.pdf

In this respect, the statement ‘contains probiotic’ is the same as stating ‘contains vitamins and minerals’ or ‘contains fibre’: all these categories of substances may have beneficial effects, but they do not specify a particular health benefit, and therefore, they are not considered as explicit health claims.

Similarly, the term ‘probiotic’ as such cannot be considered as a health claim ‘per se’. This was confirmed by the EFSA guidance indicating that the term ‘probiotic’ cannot be allowed as a health claim, as it is not sufficiently precise regarding which health benefit it supposedly offers³.



To ensure consistency and to provide clarity for the European consumers, it is essential to establish clear criteria for identifying probiotic products/ingredients.

IPA Europe recommends that the term probiotic on the product and in commercial communication should be used to describe microorganisms and food products when 4 essential requirements are met.



THE CHARACTERIZATION OF
THE SPECIES LEVEL
AND IDENTIFICATION AT
STRAIN LEVEL



THE PROBIOTIC STRAIN/S
MUST BE SAFE FOR THE
INTENDED USE



THE PROBIOTIC STATUS
SHOULD BE SCIENTIFICALLY
DOCUMENTED



PROBIOTIC STRAINS MUST BE
ALIVE IN THE PRODUCT AND IN A
SUFFICIENT AMOUNT UP TO THE
END OF SHELF-LIFE.

Enhancing clarity is imperative to alleviate the existing confusion among European consumers concerning probiotic labelling. Considering the afore mentioned points, we advocate for a comprehensive review of the European approach to align with the actual nature of probiotics as a distinct category of substances of food and food supplements.

The term ‘probiotic’ should be allowed on food and food supplements labels as voluntary information, according to the Nutrition and Health Claims Regulation, subject to meeting specific criteria and conditions of use.



We kindly request your support and collaboration in advancing this initiative. We believe that this proposal aligns with the broader goals of ensuring food safety, consumer protection, and the advancement of the European food industry.

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³ EFSA Guidance on the scientific requirements for health claims related to the immune system, the gastrointestinal tract and defence against pathogenic microorganisms. EFSA Journal 2016;14(1):4369, 23 pp. doi:10.2903/j.efsa.2016.4369 <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2016.4369>