10 November 2025

# SNE & MNI Communication to Stakeholders: Labelling Changes for Food for Special Medical Purposes (FSMP)

The medical nutrition industry currently provides information on key nutrient content on the front-of-pack for medical nutrition products or FSMPs. This helps to distinguish the key attributes of product formulation for healthcare professionals and patients. For example, this information could be on energy in kcal/ml or amount of protein per serving. This common practice has been challenged by the Court of Justice of the EU (CJEU).

The CJEU published its judgment on this topic on 9 October 2025, concluding that information on the amount of nutrients provided on the front-of-pack of FSMPs constitutes a repetition of information from the nutrition table, which is not permitted under Regulation (EU) 2016/128 on food for special medical purposes.

The Court did not accept our common industry view, that this information is an additional description of the properties and characteristics of the product related to its use, which is a mandatory element of labelling of FSMPs.

The member associations of SNE and the member companies of MNI are in the process of assessing the outcome of the judgment and its potential impact on labelling of FSMPs in the EU. The judgment will affect a significant number of product labels and will require careful consideration and management to ensure that any changes do not disrupt product availability or restrict labelling information that is essential to ensure the safe use of the products.

It is important to note that it is not a change to the law, but a legal interpretation around a labelling practice that has been followed by the medical nutrition industry for many years. The outcome may need to be taken into account carefully especially for products already available for patients.

SNE and MNI will endeavour to keep the healthcare professional community informed, should any labelling changes may be required as a result of this judgment. As representatives of the specialised nutrition industry, both organisations remain committed to ensuring that any label updates are clearly explained and effectively communicated to customers and patients. Following completion of the ongoing evaluation, SNE and MNI intend to engage with healthcare professionals at European and national level to identify practical ways to limit the impact of the judgment and maintain clarity for healthcare professionals and the patients who rely on these products.

***About SNE***

*Specialised Nutrition Europe (SNE) is the voice of the specialised nutrition industry across Europe. The members of SNE are the National Associations from 18 European countries (including a majority of EU Member States), whose members are companies producing tailor made dietary solutions for populations with very specific nutritional needs. These include infants and young children, patients under medical supervision, sportspeople, overweight and obese consumers, and those suffering from coeliac disease. Find out more on https://www.specialisednutritioneurope.eu*

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***About MNI***

*The Medical Nutrition International Industry (MNI) is the voice of the medical nutrition industry at international level. MNI's vision is to achieve better care through better nutrition, across all ages and healthcare settings. Find out more on www.medicalnutritionindustry.org*

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