

To

**Cabinet of Executive Vice-President Frans Timmermans**  
**Cabinet of Commissioner Stella Kyriakides**  
**Cabinet of Commissioner Thierry Breton**  
**Cabinet of Commissioner Paolo Gentiloni**

Brussels, 15.05.2020

***SINGLE MARKET AND FRONT-OF-PACK (FOP) NUTRITION LABELLING SCHEME  
SUPPORT OF MEPS LETTER OF 14 MAY 2020***

Dear Members of the Cabinets,

We are grateful to MEP Paolo De Castro (S&D, IT) and to his 11 MEP colleagues, including MEP Norbert Lins (EPP, DE), the chair of the COM AGRI of the European Parliament, for the letter to EU Commissioner Stella Kyriakides (see attachment), where the Single Market barrier of front of pack nutrition labelling schemes is pointed out.

Today, in Europe we are indeed faced with a multitude of different supplementary nutrition labelling systems pushing companies to differentiate products labelling according to the outlet market and hence building up barriers to our Single Market for food. The smooth functioning of our Single Market has proven critical over the past weeks.

Although they are voluntary, many systems are promoted by public authorities and/or actively supported by the retail sector. As you know, the promotion of compliance with a technical rule means a qualification as a “de facto” rule.

We would like to stress that the Single Market is a crucial element for the European Union. It is a key instrument to the overall health and stability of the European Union as it represents the very foundation of the integration project. Therefore, the opportunity for harmonization is more than ever an urgent issue.

Unfortunately, both national Governments - by promoting these schemes - and the European Commission - by not taking the lead of the internal market back in hands - are creating huge uncertainties and difficulties among operators.

There is a growing feeling of frustration among us, in the middle of the COVID-19 emergency and when the European Institutions are just about to ask extra efforts to become greener. But there cannot be any Green Deal without an internal market deal.

Therefore, we call for a voluntary and harmonized EU FOP nutrition labelling scheme based on the following characteristics<sup>1</sup>.

### **OBJECTIVELY INFORMATIVE, NOT IMPLYING A FOOD CLASSIFICATION**

It should offer an informative tool which may induce the consumer to go more in detail by reading the nutrition declaration. It should facilitate the understanding of the nutritional characteristics of the food, to allow for a responsible choice in the context of a balanced diet, and not communicate its supposed and over-simplified health properties, provided that such form of expression is transparent, objective and non-discriminatory. It should facilitate the information to consumers on the levels of intake of macro- and micronutrients and not to combine their different composition in order to formulate a simplistic ranking of foods, that is too often not in line with dietary guidelines or the actual nutritional needs. Furthermore, it should act in support of and not as substitute for specific nutrition actions – e.g. food education programmes - and recommendations in the context of public health policies.

### **SCIENTIFICALLY BASED BUT NOT PURELY MATHEMATICAL**

Given that each individual has different nutritional needs that depend on many variables, among which the principal is age and gender, it should be based on sound and scientifically valid researches and, according to point 3.5 of Codex Alimentarius Guidelines on Claims, should not arouse or exploit fear in the consumer.

We strongly oppose a pure mathematical approach which combines the different composition of a very limited number of macronutrients, in order to formulate a ranking of the food, therefore not taking into account essential elements such as the overall diet of an individual and cultural aspects reflected in traditional recipes and in the link with rural territories and geographical areas. The result would be an overall verdict on food. All the more, as a source of scientific information, these schemes fall short. The opinion in question may be biased or ill-judged because it is based on a mathematical calculation that is not visible to the consumer. Most importantly, the bases and tenets of this calculation are often debatable and, indeed, much debated.

Moreover, there is one aspect that is often overlooked: the pleasure of eating and social interaction. This factor is an integral part of our diets and is, unfortunately, too often forgotten by mathematicians, yet it is an essential part of health and wellbeing, not only in these crisis times.

### **NOT OPEN TO COMMERCIAL INSTRUMENTALIZATION**

It should not oblige Companies to modify their traditional, unique and iconic recipes and specifications, which are often legally compulsory and hence cannot be by-passed. Many of these cunning schemes, by undermining aspects different to copy or imitate such as tradition and culture, risk flattening the diversified European food cultural heritage leaving the EU motto – in varietate concordia – a dead letter.

In conclusion, we are aware that by “reformulating” foodstuff one could obtain better scores, based on mathematical calculation. But this does not translate into better products, not a better diet. We

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<sup>1</sup> The call for reasonable guiding principles for such schemes is not new, as can be seen in the example of EDA’s principles already shared with the COM services mid-2018: [http://www.euromilk.org/fileadmin/user\\_upload/Public\\_Documents/EDA\\_Position\\_papers\\_-\\_Fact\\_Sheets/Position\\_papers/2018\\_07\\_19\\_EDA\\_guiding\\_principles\\_on\\_FOP\\_FINAL.pdf](http://www.euromilk.org/fileadmin/user_upload/Public_Documents/EDA_Position_papers_-_Fact_Sheets/Position_papers/2018_07_19_EDA_guiding_principles_on_FOP_FINAL.pdf) and CLITRAVI’s principles shared with the COM services in 2017: <http://www.clitravi.com/wp-content/uploads/2017/10/26.pdf>

do not accept to betray our history and culture, crucial values for our consumers nor our quality ambitions, that have permitted us to build a genuine and long-lasting relation of trust with the consumers and citizens in the Union and around the globe, but wish for a valid system that helps citizens to enhance their dietary choices (see also footnote).

Rather than judging food we are firmly convinced that labelling is a part of a wider food educational process. That is why we are engaged to communicate in a transparent way the characteristics of our products and let the consumers choose on the basis of their real needs and cultural habits.

Hoping that our views and considerations will be taken into account, we thank in advance for your attention.

Your sincerely

Dirk Dobbelaere



CLITRAVI Secretary General

Alexander Anton



EDA Secretary General

### About CLITRAVI

CLITRAVI is the European Association for the Meat Processing Industry which represents about 13,000 companies active in the production of a wide variety of meat products in the European Union. The meat processing industry in Europe is mainly composed of small and medium sized companies employing 350 000 persons with more than 80 billion € sales. The vast majority of these SMEs operate since many generations in rural areas throughout Europe.

### About The EUROPEAN DAIRY ASSOCIATION

The European Dairy Association is the voice of the dairy processors, cooperative and privately owned dairies, in the European Union.

The membership of EDA consists of associations of dairy processors in EU Member States and covers 95% of all milk processed in the Union.

The EU dairy industry is partnering on a daily basis with around 700.000 dairy farms across the Union and directly employs 300.000 people in more than 12.000 processing sites.