

European Commission

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Brussels, 8 September 2022

Re: Joint letter on proposal for a harmonised FOP labelling scheme

Dear Commissioners,

In the Farm to Fork Strategy, the Commission declared its intention to present a proposal for a harmonised "Front-of-Pack" (FOP) labelling scheme for all EU countries by the end of 2022. An impact assessment analysing several existing FOP schemes is currently ongoing.

As the deadline for presenting the proposal is approaching, on behalf of the undersigned associations we would like to reiterate that such initiative should remain voluntary as well as our deep concerns if the option of an interpretative/colour-coded FOP scheme, such as Nutri-Score, should become the preferred EU FOP scheme.

In the light of the numerous arguments against the adoption of such a scheme - which is considered by many stakeholders as misleading, over-simplistic and incapable of educating consumers to follow healthier diets - the signatories would regard the choice of a colour-coded FOP scheme such as Nutri-Score as unacceptable.

We want to underline that there is no scientific evidence on the effects that "Nutri-Score based" diets may have on people's health. At the same time, we counted several scientists^{1,2,3} and scientific organisations⁴ across Europe who have raised their criticisms publicly against Nutri-Score. This is a clear symptom that there is no consensus within the scientific community on that scheme.

The Nutri-Score judges the degree of healthiness of foods through an algorithm, based on only very few chosen nutrients, leaving aside many other essential ones. It is not able to convey the real nutritional value of a food or its degree of processing. In addition, it is based on 100g for each food

¹ https://voedingsjungle.files.wordpress.com/2019/10/brandbrief_front-of-pack-nutrition-labelling_voedingsjungle_def-2-1.pdf

² <https://www.triptolemos.org/wp-content/uploads/2020/09/REPORT-ON-THE-FRONT-LABELLING-OF-FOOD.pdf>

³ <https://www.dlahandlu.pl/detal-hurt/wiadomosci/system-nutri-score-nie-informuje-o-wszystkim-sprzedaz-czerwonych-produktow-spadnie,103665.html>

⁴ <https://www.fesnad.org/resources/files/notaPrensa.pdf>

and not on a portion-sized serving that is actually consumed, resulting in paradoxical ratings. This may lead to foods receiving a better rating without being necessarily better from a nutritional point of view.

Furthermore, the division of foods into “healthy/green” and “unhealthy/red” would lead to foods considered healthy (“green”) to be consumed in portions that are not in line with those recommended by nutritionists, with subsequent negative impacts on consumer’s diets and health. As confirmed by EFSA in its recently published Opinion on FOP and nutrient profiles⁵, a healthy, varied, and balanced diet consists of the combination of different foods with different nutrient profiles.

Nutri-Score could also have a significant impact on competitiveness. By labelling foods as “good” or “bad”, an inadequate colour-coded and judgmental scheme could lead to market distortions and discrimination, favouring some products over others. Nutri-Score could affect prices - green products could benefit from supermarket discounts (already the case in Belgium for the retailer Ahold Delhaize) or other fiscal benefits, as well as procurement and taxation policies.

Importantly, robust scientific real-life evidence for Nutri-Score in a supermarket setting, and for a complete supermarket food basket, is still missing. Concerningly, no study has found an effect of Nutri-Score on the FSA-NPS for a complete basket of supermarket shopping. Thus, Nutri-Score lacks an essential part of the scientific evidence needed to support the potential claim that it has a positive effect on the healthiness of the consumer’s supermarket food basket in real life. This means that Nutri-Score does not fulfil the currently required EU legal standards governing the approval and use of health claims on food. Furthermore, a recent study on child obesity concluded that the traffic light system, comparable to the colour-graded Nutri-Score, was found to have no positive effect on obesity. On the contrary, (child) obesity continues to increase.⁶

With the growing obesity crisis, this is no time for compromise. The Commission must remain focused on the ultimate purpose of adopting an EU FOP scheme, namely, to better inform consumers and help them follow healthier diets. The introduction of an EU-wide FOP scheme must not be about simply orienting their purchasing choices, especially if they are ill-oriented. We believe that such a system should follow the following key elements:

1. It should be based on sound science and follow dietary guidelines.
2. It should be voluntary.
3. It should be (sub-)category-specific: A front-of-pack scheme should help consumers to better identify nutritional options within sub-categories of products.

⁵ EFSA, 2022. [***Scientific advice related to nutrient profiling for the development of harmonised mandatory front-of-pack nutrition labelling and the setting of nutrient profiles for restricting nutrition and health claims on foods.***](#) On page 4 EFSA states that *“because diets are composed of multiple foods, overall dietary balance may be achieved through complementation of foods with different nutrient profiles so that it is not necessary for individual foods to match the nutrient profile of a nutritionally adequate diet. Nevertheless, individual foods might influence the nutrient profile of the overall diet, depending on the nutrient profile of the particular food and its intake, in terms of frequency and amount”*. On page 7 it is added: *“The nutrient profile of the overall (habitual) diet is an important determinant of health and the nutrient profile of a nutritionally adequate diet is defined by science-based recommendations for intakes of energy and nutrients (i.e. Dietary Reference Values (DRVs))”*.

⁶ <https://www.gov.uk/government/publications/child-obesity-patterns-and-trends>

4. It should take into account the complexity of food products: the nutritional value of food products is not limited to their energy intake and their fat, sugar and salt content.
5. It should maintain the exemption of certain special categories of food and recognizes the special needs of SMEs.
6. It should be objectively informative not opened to commercial interests and not implying food classification as colour-coded schemes: a colour-coded system will result in an overly simplistic classification that will lead to a differentiation between those products that are “good”, in green, and those that are “bad”, in red.
7. It should be portion-based.
8. It should be supported with the appropriate education of the consumer.
9. It should be a harmonised EU system.

We hereby call upon the European Commission to work on a solution that takes into consideration the above-mentioned elements to provide consumers with the accurate information they need in order to make informed decisions toward a healthier diet and effectively improve the nutritional quality of their food basket instead of orienting purchasing choices based on a classification that is questioned within the scientific community.

With our kind regards,



COPA-COGECA – Secretary General – Pekka Pesonen



CLITRAVI – Secretary General – Dirk Dobbelaere



CEEV – Secretary General – Ignacio Sánchez Recarte



EDA – Secretary General – Alexander Anton



IBC – International Butchers` Confederation – Managing Director – Kirsten Diessner



UECBV – Secretary General – Karsten Maier