

## **A need for a common Front-of-Pack nutrition label**

The European Commission (EC) has launched, on May 20th 2020, two important communications. The first was the Farm to Fork strategy (F2F), concerning a fair, healthy, and environmentally friendly food system. The second was a report presenting the main FOP (Front-of-pack) nutrition labelling schemes currently implemented or being developed at EU level. Regarding the provision of food information to consumers (FIC), the F2F has unveiled an action plan proposing a harmonised mandatory FOP nutrition labelling to enable consumers to make health conscious food choices. The EC wishes to publish its scheme for the end of 2022.

### **Definition and background of the FOP**

Introduced in the late 1980's by NGOs and government agencies, FOP nutrition labelling aims to help consumers with their food choices by providing at-a-glance nutrition information and is increasingly seen as a tool to support strategies for the prevention of diet-related non-communicable diseases.

Under the Commission's proposal for a Regulation on the FIC, it was decided, back in 2008, that food business operators were supposed to display, on a mandatory basis, details about energy, fat, saturated fat, carbohydrates, sugar and salt on the FOP of prepacked processed foods. Notwithstanding, domestic agencies were allowed to develop voluntary national schemes to declare these mandatory elements through other presentation formats.

The co-legislators decided to keep the FOP labelling concept but to remove its mandatory nature. It was determined that the matter should be left to Member States and to food business operators to develop their own designs, adapted to their consumers, provided they comply with certain criteria. The aim was to gather experiences on the functioning of the various schemes in Member States, in order to take a more informed decision on possible further harmonisation at a later stage.

Given that obesity and overweight is a common issue to many Member States, which is commonly linked to harmful consumption habits, the interest from public authorities and NGOs in FOP nutrition labelling has been growing since the adoption of the FIC Regulation. The policy objectives of FOP labelling are generally two-fold: to provide

additional information to consumers to inform about healthier food choices; to encourage food business operators to reformulate products towards healthier options (Kanter et al., 2018).

FOP labelling is thus increasingly seen as a tool to support strategies for the prevention of obesity and other diet-related non-communicable diseases. Today, several FOP schemes have been developed and implemented across the EU. Against this background, the FIC Regulation, adopted in 2011, required the Commission to provide a report on the use and impact of the various schemes and on the advisability of further harmonisation.

### **FOP frameworks of labelling schemes around the EU**

The Keyhole logo, developed by the Swedish National Food Agency and introduced in Sweden in 1989, was the first FOP logo system to be implemented in the EU. It is a voluntary free-of-charge label in the form of a symbolic green representation that identifies the healthier choice within 33 defined food groups. The logo is also used by Denmark and Lithuania.

Finland approved the "Heart Symbol - Better choice" in 2000. The criteria for using the symbol (fat, salt, sugar and/or fibre content) are defined for nine main food groups. In Slovenia, the 'Protective Food' (also called 'Little Heart') logo was introduced in 1992 and was promptly promoted by the government (Miklavc et al., 2016). It applies to pre-packed foods that meet specified nutrition criteria.

In October 2017, France adopted the Nutri-Score scheme after a several number of experiments and studies. The Nutri-Score indicates the overall nutritional quality of a given food item. The label is represented by a scale of five colours, from dark green indicating food products with the highest nutritional quality to dark orange for products with lower nutritional quality, associated with letters from A to E. Belgium, Germany, Spain, the Netherlands and Luxembourg also announced their decision to adopt the scheme.

In January 2020, Italy addressed a recommendation to the Commission regarding the use of the voluntary front-of-pack scheme 'NutriInform Battery'. The scheme is based on the Reference Intakes label, with an added battery symbol indicating the amounts of energy and nutrients in a single serving as percentage of the daily intake. The scheme is not yet present on the EU market.

Independently from the design, an important policy objective of FOP nutrition labelling is to help consumers to make healthier food choices (Kanter et al., 2018). Evidence seems to suggest that FOP labels fill an informational gap or an unmet consumer need, with older and overweight/obese people more likely to report a need for a FOP label (Joint Research Centre, 2020).

### Misleads caused by FOP label models

After analyzing some products available at a supermarket in Belgium, one of the countries that has implemented the NutriScore model, SAFE has acknowledged that this model is not coherent and it does not consider harmful components as additives and how processed and industrialized the product is.

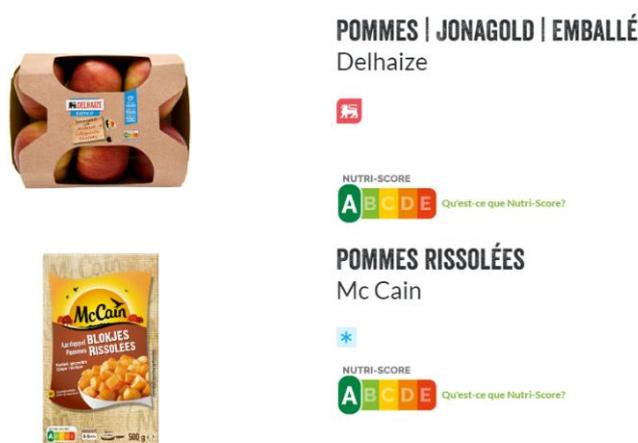


Image 1 (taken from Delhaize's online store on 20/07/2020)

In the image displayed above, the Belgian supermarket has rated both products with A, considering both products are good for consumers health. However, it seems dubious that both products classified in the same way because there are clear differences in the nutritional value of both products, since a natural product like an apple could never be considered as healthy as pre-cooked deep-fried french fries

The following image compares two types of oil, one extracted from sunflowers and another from olives. The NutriScore model considers the sunflower oil, meant mainly for deep frying, a product healthier than extra virgin olive oil, a multi-purpose oil used for frying, seasoning and an essential part of the Mediterranean cuisine. In the same rate of the olive oil there are jelly candies, a processed product without any nutritional value.

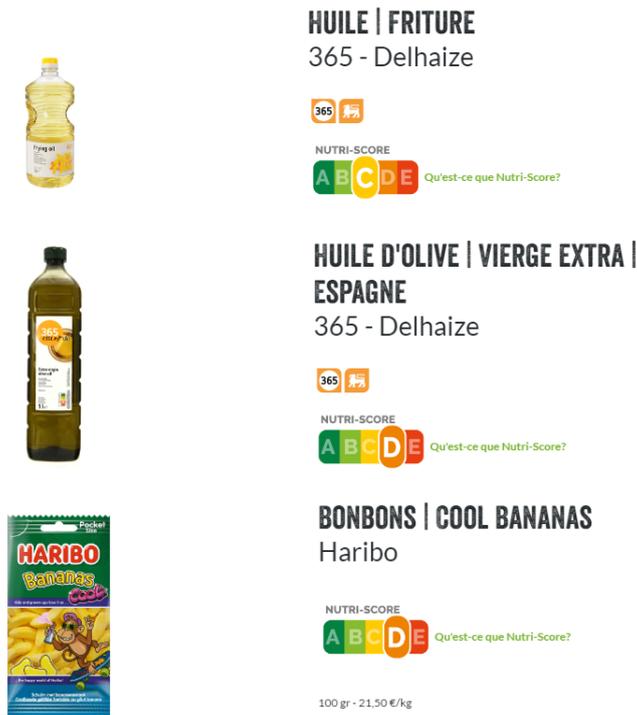


Image 2 (taken from Delhaize's online store on 20/07/2020)

In the image that follows (image 3) there are two comparisons. The first one shows Coca-Cola light presented as “B”, which suggests a semi-healthy option, while a 100% pineapple natural juice is considered a “C” because of its sugar levels. In these examples, some nutritional components such as the amounts of sugar and fat are rightfully considered and displayed, but other (sometimes unhealthy or potentially harmful) food components like food additives (‘E’ numbers) are not taken into account while giving an ‘A’ or an ‘E’ to a food product, which can obviously mislead consumers into buying unhealthy food products.

The second comparison, in the image 4, is also very misleading because it considers both products as “B”. It seems incongruous that a processed pizza with beef, chicken and several additives can be considered as healthy and nutritious as a natural product as a coconut used for several things as food, drinks or organic cosmetics.



### COLA | LIGHT | PET Coca-Cola



6 x 1,5 l - 1,44 €/l



### JUS | 100% ANANAS Delhaize



1 l - 1,99 €/l

Image 3 (taken from Delhaize's online store on 20/07/2020)



### PIZZA CANNIBALE Delhaize



### NOIX DE COCO | BIO | CAT1 Delhaize - Bio



Image 4 (taken from Delhaize's online store on 20/07/2020)

The misleading aspects of this FOP label scheme are not only bounded to the NutriScore model. In the following image we could compare two products available in a supermarket in the UK, under the nutrient profiling scheme. The comparison suggests that Coca-Cola is healthier than codfish fillets (or at the same level), which generates a questionable decision that can be harmful to consumers. As we can see, this is not a matter a specific FOP label scheme, but an issue inherent to different models.



Image 5 (photos taken at supermarket in London in July 2020)

## SAFE's position

SAFE believes that misleading labelling information that does not reflect the real nutritional value of a food product should be prohibited. Consumers should indeed be able to make informed choices by having clear and understandable information on food packaging, or by being sure that health messages on food products are scientifically justified. This implies the consideration of all components in a food product: for instance, the potential toxicity of some food additives should be displayed as clearly as the amounts of fat, salt and sugar.

We are looking forward to the establishment of a FOP label common to all member states of the EU, as suggested in F2F strategy. SAFE believes there is a clear need for a well-researched model that can only be achieved by independent institutions without any interference of lobbyists. This is the only way to accomplish a model beneficial for all European consumers. A common FOP label would facilitate the integration of the model, which would be easily perceived by everyone, even during visits or while living at other countries inside the EU.

As shown in the examples afore, the current FOP label schemes can be very deceitful, as they only consider components as fat, sugar, salt and saturates. These factors should in fact be deemed, but other elements like additives and types of processing must also be studied in order to promote a sustainable and healthy food system in Europe.