

SAFE’s response to EFSA Scientific Opinion advising on the development of harmonised mandatory front-of-pack nutrition labelling and the setting of nutrient profiles for restricting nutrition and health claims on foods

About Safe Food Advocacy Europe – SAFE

SAFE – Safe Food Advocacy Europe was created with the aim of ensuring that consumer’s health and concerns remain at the core of the EU’s food legislation. SAFE is currently the only Brussels-based NGO specialised in the protection and representation of EU consumers in the food sector.

SAFE strives to ensure safer food standards for consumers by monitoring the EU food legislation process and cooperating with EU stakeholders to draft comprehensive food regulations. SAFE notably supports the development of policies and awareness-raising actions which jointly address health, environment, food safety and sustainability, all-the-while being involved in several EU-funded projects aimed at reducing the environmental impact of the food sector, increasing sustainability and promoting healthier food environments for consumers.

Introduction

In May 2020, the Commission adopted the Farm to Fork Strategy¹ for a fair, healthy and environmentally friendly food system, as part of the European Green Deal. The Strategy indicates that a proposal for harmonised mandatory front-of pack nutrition labelling and for the setting of nutrient profiles to restrict the promotion of foods high in salt, sugars and/or fat will be submitted in Q4 2022.

In the present mandate, the Commission requests the European Food Safety Authority’s (EFSA) scientific advice 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.

1. General comments on EFSA opinion

SAFE welcomes the opportunity to comment on EFSA’s Opinion.

SAFE strongly believes in the merits of providing the public with simple-to-understand information, which elsewhere in the world has already demonstrated its ability to shape purchasing and consumption habits. This is also consistent with the conclusions of the Commission’s report on front-of-pack nutrition labelling² that “front-of-pack schemes have the potential to help consumers make health-conscious food choices”.

We welcome all the steps towards proper consumers protection taken by the legislative initiatives foreseen in the Farm to Fork Strategy, and we hope the new framework will guarantee all European consumers access to clear information and to enabling food environments.

¹ COM(2020) 381 final

² COM(2020) 207 final

SAFE also recognizes the urgency of the concerns underlying the call for mandatory nutrition labelling, in the light of the clear link between certain dietary habits and the development of non-communicable diseases (NCDs), metabolic disorders, and malnutrition (both in the sense of insufficient intake of certain nutrients and excessive intakes of others)^{3 4}. As such, SAFE strongly supports the introduction of a mandatory nutrition labelling scheme, which should reflect the latest scientific research as it relates to the relationship between diet and metabolic diseases and NCDs⁵, and be capable of orienting consumption towards actually healthier choices.

2. Specific remarks

The Opinion mentions that “energy could be included in nutrient profiling models because a decrease in energy intake is of public health importance for European populations; in food group/category based nutrient profiling models, total fat could replace energy owing to its high energy density in most food groups, while the energy density of food groups with low or no fat content (e.g. water-based non-alcoholic beverages, jams and marmalades) may be well accounted for by the inclusion of (added/free) sugars in the model”.

We believe that a sole focus on the energy intake disregards other important issues connected with rising incidence of NCDs, such as the presence of additives, colorants, and other food components with no nutritional value. In addition, the proposal to replace energy with total fat or added/free sugars does not enhance clarity or effectiveness of nutrition labels.

We believe that the EFSA’s advice should reflect the more recent scientific intelligence, establishing a strong correlation between the dietary intake of processed and ultra-processed foods – which also results in a relatively high dietary intake of food additives – and adverse health outcomes (including obesity, metabolic diseases, NCDs and even neurological effects capable of resulting in depression)⁶.

Studies shows processed and ultra-processed foods, with their production technologies and their rich cocktails of additives, do not constitute healthy or sustainable choices, given their strong potential for disrupting the human microbiome, and other possible adverse health effects⁷. As such, we believe that consumers should be provided with information as to the degree of processing that their food has undergone, and to the number of additives that their food contains.

3. Conclusions

We welcome EFSA’s conclusion that European consumers diets should be more based on the consumption of whole grains, fruits, legumes, butts and seeds, fats-reduced milk whereas meat and processed meat

³ For further information on SAFE’s position on FOP nutritional labelling please check our <https://www.safefoodadvocacy.eu/wp-content/uploads/2021/01/SAFE-Comments-on-Roadmap-on-FOP-Date-Marking-Nutrient-profiles.pdf>

⁴ Obesity and diabetes, for example, continue to trend up in France, the earliest adopter of the Nutriscore labelling system, with the relevant curves seemingly unaffected by its introduction. [le-diabete-en-france-les-chiffres-2020](#); [obesityandtheeconomicsofpreventionfitnotfat-francekeyfacts.htm](#)

⁵ For all, Lane, M.M. et al. (2021), “Ultra-processed Food and Chronic Noncommunicable Diseases: A Systematic Review and Meta-analysis of 43 Observational Studies”, *Obesity Review*, vol 22, no 1, pp 1-19

⁶ See footnote 5 above.

⁷ Examples of studies: Cotter T, Kotov A, Wang S, et al ‘Warning: ultra-processed’ — A call for warnings on foods that aren’t really foods *BMJ Global Health* 2021;6:e007240, Global Food Research Programme, Ultra-processed food: a global threat to public health https://www.globalfoodresearchprogramme.org/wp-content/uploads/2021/04/UPF_ultra-processed_food_fact_sheet.pdf



should be replaced by legumes and pulses. Furthermore, we welcome the acknowledgement that the “reduction in the intake of added and free sugars is of public health importance for European populations”.

However, SAFE would like to stress that energy intake cannot constitute the single indicator for the nutritional profiles of a products, as other food components should be better communicated to consumers. In this regard, the number of additives contained in foods, as well as colourants and other chemical ingredients, should be more precisely considered when assessing the nutritional value of a product.

We also invite EFSA to consider whether the content of dietary fibre should be presented as an absolute value or as a ratio of dietary fibre relative to energy, as the latter would typically be expected to be lower/less favourable for ultra-processed foods.

We are confident that EFSA and the European legislators will raise to the challenge on the topic of nutrition labelling, responding to civil society’s calls for effective protection and guidance in relation to food choices.