



# COPA AND COGECA'S PROPOSAL ON THE USE OF FRONT OF PACK (FOP) NUTRITIONAL LABELLING SYSTEMS

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Feed and Food

**copa**\***cogeca**  
european farmers      european agri-cooperatives



## INTRODUCTION

In its Farm to Fork Strategy, the Commission states that they will propose a harmonised mandatory front-of-pack nutrition labelling, also referred to as the FOPNL system, by 2020 to “enable consumers to make health conscious food choices”. Furthermore, in its report “regarding the use of additional forms of expression and presentation of the nutrition declaration” published on the same day, the Commission seems to give its favor towards the use of a colour-coded system of FOPNL.

As farmers and also as consumers we welcome the opportunity to support a measure improving citizens’ health, transparency and food information to consumers. More than that, we believe that the high nutritional quality of the food we take pride in producing can contribute to it. However, we are afraid that a mandatory colour-coded FOPNL system would not allow to achieve this objective and would penalise hard working farmers by discriminating many quality and highly nutritionally valuable products.

Therefore, EU farmers calls on the European Institutions and on the Member States to take into account the basic concept of “Informing without misleading” when implementing a EU-wide FOPNL scheme.



Copa and Cogeca recognise the importance of the Front of Pack (FOP) nutritional labelling topic in the current discussions taking place in the European institutions, as do European consumers.

Many Member States have adopted some voluntary FOP nutritional labelling systems within their territory, and the topic is in the spotlight as one of the priorities of the Farm to Fork strategy<sup>1</sup>. Therefore, Copa and Cogeca would like to reiterate the following key principles that should underpin any future FOP labelling system:

- **Positive & non-discriminatory colour-coding systems**

The colour-coding systems that are currently used discriminate against certain categories of food products because they divide foodstuffs into those that are good or bad in a questionable manner. While any labelling system should be informative and easy to understand, it should not be overly simplistic. Using a system that categorises food products as either good or bad risks high-quality and nutritious products, such as olive oil, being shunned. Such products have beneficial consequences for human health and are recommended in many diets that have been carefully studied from a nutritional point of view. This type of contradictory FOP labelling also implies a

stigmatisation of specific products that are historically part of our gastronomy and rural traditions, and that, eaten in the appropriate amounts, can play a key role in a balanced diet. Therefore, we support a FOP labelling scheme that does not stigmatise any specific food products. In particular, an EU system should not endanger, neither directly nor indirectly, EU quality food products – e.g. PDOs, PGIs and TSGs – that, unlike highly processed products, cannot be reformulated and have to follow strict and traditional production disciplinary codes. Moreover, jeopardising EU quality schemes would mean nullifying the European Commission's efforts to promote these products both within the European Union and abroad.

- **Science-based & independent**

Nutrition is indeed a scientific discipline, thus it should be addressed as an individual topic, separately from other factors (e.g. personal beliefs). Copa and Cogeca is convinced that the role that the European Food Safety Authority (EFSA) plays in the field of nutrition is of the utmost importance in order to provide EU policy-makers with solid, independent and trustworthy input necessary to develop EU-wide dietary guidelines. We cannot accept FOP systems developed by private actors within the food chain. Independence is

<sup>1</sup> - European Commission Communication on the Farm to Fork Strategy released on 20th May 2020: [https://ec.europa.eu/info/sites/info/files/communication-annex-farm-fork-green-deal\\_en.pdf](https://ec.europa.eu/info/sites/info/files/communication-annex-farm-fork-green-deal_en.pdf)

pivotal, as proper nutrition is the baseline for preserving human health.

### • Harmonised & EU-wide

We are currently witnessing the emergence of country-specific FOP labelling systems and as a result a proliferation of different national algorithms that are disrupting the internal market. This situation is creating several problems for the free movement of goods, as each label has to be adapted to each Member State in which the product is expected to be sold. The lack of harmonisation is also a clear sign of weakness of the FOP labelling schemes currently in place. Any European FOP labelling system must be harmonised across the entire EU territory and developed according to the science-based instructions laid out by EFSA.

### • Based on dietary guidelines

Although national and international dietary guidelines may differ slightly as regards specific products, quantities and consumption patterns, there is broad consensus on the food groups considered essential for a proper diet. It is worth mentioning that the science of nutrition has increasingly expanded the knowledge and scientific literature available on the topic, which should therefore be properly assessed and taken into account. We are currently witnessing a proliferation of positive labels on food and drink products that are not even included in the dietary recommendations. It is clear that some food and drink categories are recognised as necessary to sustain human health and as irreplaceable, whereas others are not. A positive label should only be allowed on food and drink products that fall within science-based dietary guidelines.

### • Based on a complete assessment of the “food matrix”

Each food and drink product contains different macronutrients and micronutrients. When establishing nutritional labelling, a complete evaluation of the food should be carried out, without being based exclusively on certain nutrients. Notably, recent studies show that

the individual ingested nutrients alone cannot determine the health benefits of a product, which are rather the result of synergies and connections within the overall “food matrix”<sup>2</sup> of the product itself.

### • Portion-based

People consume portions, the size of which varies from one product category to another. Therefore, any FOP labelling scheme should address the portion concretely recommended by dietary guidelines for each product category and in a way that is harmonised across the whole European Union, clearly stating that the label is referring to a specific amount of the product (e.g. “X” grammes). These portions should be established by a scientific and independent agency, such as EFSA, taking into account dietary guidelines and consumers’ eating habits. Assessing a product based on the standard 100 grammes, when it is consumed in much smaller quantities, is misleading and does not allow for a clear understanding of the dietary guidelines. Therefore, the nutritional assessment of a product should be based on portions. Moreover, if the 100 grammes reference for nutrient content is still useful for calculations related to cooking purposes or very specific diets, it will still be provided on the back of the packaging as required by Regulation (EU) No 1169/2011.

### • Voluntary

Any additional label may increase costs and heighten administrative burdens for the operators in the food chain. In addition, some products may vary slightly from one batch to another (given e.g. their nature or the farming conditions) making it difficult to apply the same FOP label to all the products within that category. Therefore, it should be left to the operator in the food chain to establish if it is relevant and coherent to apply any FOP label or not, according to the added value that is returned to the food chain.

Copa and Cogeca would like to conclude by underlying that consumers should not rely exclusively on labels in order to purchase products. Taking care of their own diet is a

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2 - “The food matrix may be viewed as a physical domain that contains and/or interacts with specific constituents of a food (e.g. a nutrient) providing functionalities and behaviors which are different from those exhibited by the components in isolation or a free state” (Aguilera, 2018. <https://doi.org/10.1080/10408398.2018.1502743>)

conditio sine qua non for taking care of their own health.

Therefore, we reiterate that educating consumers is pivotal to properly understand the benefits of eating agricultural products, when integrated into diets according to the patterns and quantities specified by internationally recognised guidelines, and with the correct interpretation of any future FOP labelling scheme. No label will ever be able to overcome the lack of understanding, knowledge and motivation needed to follow dietary guidelines necessarily developed by EFSA in the future. If we want consumers to adopt healthy diets and eating habits, we need large-scale nutrition education and awareness-raising campaigns starting from the earliest age possible.

Such campaigns should also underline that a healthy diet is only one of several key factors needed to enjoy good health. A balanced diet should always be coupled with physical activity and good general life-style habits.







**Copa and Cogeca are the united voice of farmers and agri-cooperatives in the EU.**

Together, they ensure that EU agriculture is sustainable, innovative and competitive, guaranteeing food security to half a billion people throughout Europe. Copa represents over 23 million farmers and their families whilst Cogeca represents the interests of 22,000 agricultural cooperatives. They have 66 member organisations from the EU member states. Together, they are one of the biggest and most active lobbying organisations in Brussels.

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