Nutrition labelling & Front-of-Pack labelling

Unilever Perspective
Nutrition Labelling commitment is part of broader agenda in responsible products

Unilever Sustainable Living plan 2010-2020

Nutrition is one of the nine pillars in the Unilever Sustainable Living Plan

<table>
<thead>
<tr>
<th>Highest Nutritional Standards</th>
<th>Reduce salt</th>
<th>Reduce saturated fat</th>
<th>Remove trans fat</th>
<th>Reduce sugar</th>
<th>Reduce calories</th>
<th>Reduce saturated fat</th>
<th>Nutritional labelling</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target</td>
<td>60%</td>
<td>75%</td>
<td>90%</td>
<td>100%</td>
<td>25%</td>
<td>80%</td>
<td>100%</td>
</tr>
<tr>
<td>Goal</td>
<td>61%</td>
<td>77%</td>
<td>80%</td>
<td>100%</td>
<td>23%</td>
<td>93%</td>
<td>99.7%</td>
</tr>
</tbody>
</table>

Unilever Future Foods nutrition commitments 2020-2025

<table>
<thead>
<tr>
<th>Goal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Double the number of products sold that deliver positive nutrition</td>
</tr>
<tr>
<td>Defined as products containing meaningful amounts of vegetables,</td>
</tr>
<tr>
<td>fruits, proteins, fibre, unsaturated fatty acids or micronutrients</td>
</tr>
<tr>
<td>such as vitamins, iron and calcium.</td>
</tr>
<tr>
<td>85% of our Foods portfolio to help consumers reduce their salt</td>
</tr>
<tr>
<td>intake to no more than 5 g per day by 2022.</td>
</tr>
<tr>
<td>70% of our portfolio to meet WHO aligned nutritional standards by 2022</td>
</tr>
<tr>
<td>95% of packaged ice cream to contain no more than 250 kcal per serving by 2025</td>
</tr>
</tbody>
</table>

Strategy and goals | Unilever
Unilever Nutrition Labelling commitment implemented on 99.7% of our global portfolio

Front-of-pack icon showing energy content as either a percentage contribution to the daily recommendation or as an absolute quantity.

Per portion (preferred option) or per 100 g/ml.

• We recognize that GDA values might not be enough, and that (additional) interpretative elements are needed
• We commit to implement government-endorsed FOP schemes that are aligned with our principles
  • Prerequisite that the FOP labelling scheme is accepted in the countries where these products will be on the market to avoid unnecessary complexity in our supply chain
  • FOPL schemes are in addition to our nutrition labelling commitment, pending local legal restrictions

‘Big 8’ nutrients on back-of-pack (energy, protein, carbohydrate, sugars, fat, saturates, fibre and sodium).

For energy, sugars, fat, saturated fat and sodium, the percentage contribution to the daily dietary recommendation is given as an icon or text on back-of-pack.
Unilever Position on Nutrition FOP labelling summarized

Key principles of FOP labelling schemes

- **Scientifically sound**, reflecting internationally accepted dietary guidelines
- **All-inclusive**
- **Encourages healthy choice**, innovation, optimization, and reformulation
- Focuses on key nutrients of public health concern, with **limited compensation** by positive nutrients

Our principles are best reflected if the algorithm underlying FOP labelling schemes are **product group specific** or **based on regulated portions**, and not based on 100g/ml

Key elements of context

- **Harmonisation** across regions (ideally globally)
- Embedded in **broader programmes** to stimulate healthy diets and lifestyles
- Supported by continuous **consumer education** campaigns & independent effectiveness studies
- We favour **encouraging/positive logos** over discouraging/warning logos

We want to **work with all stakeholders** involved to develop and implement FOP labelling systems with interpretative elements
Why we do not support a 100g/100ml approach

Amount of nutrients consumed is overestimated when scoring is based on 100g

Amount of nutrients consumed is underestimated when scoring is based on 100g

portions = 100g
Why we support nutrient profiling based on portions or product group specific criteria

Need to provide insight in right portion size

Product group specific criteria work best

Conclusions:
- All other things being equal, nutrient profile models designed to promote an achievable healthy diet should be category specific but with a limited number of categories.
- However models which use a large number of categories are unhelpful for promoting a healthy diet.
Unilever view on Nutri-Score

We support the visual expression of Nutri-Score, however we believe that the algorithm underlying Nutri-Score should be adjusted:

• Introduce a portion element (requires EU regulated portion sizes) or product group specific approach
• Better reflect dietary guidelines

We announced in October 2020 that NS will be adopted on Knorr products only, with the use of a portion logo.
Product Group recommendations

Schemes analysed that are developed for M2K, N&H claims, reformulation, and FOP labelling:

Best alignment between EFSA, EU Pledge, Choices and Keyhole

- Limited number of product groups (8-9), note that WHO EU has ~17 product groups
- There is a bigger alignment between the product groups of the different schemes
- There is already some overlap between Nutri-score adapted algorithms
Limited set of product groups that better reflect dietary guidance and the role of the product in the diet

Fruit/Vegetables  Cereals/Carbs  Meat/Fish  Fats  Dairy
Meals  Sauces/Condiments  Beverages  Snacks/treats

Nutrient Profiles for product groups must be developed by independent scientific experts
# Proposal - adaptation of current NS groups

<table>
<thead>
<tr>
<th>Product groups suggestion</th>
<th>Fats</th>
<th>Dairy</th>
<th>Beverages</th>
<th>Meals/ composite dishes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Alignment with Nutri-score</strong></td>
<td>NS has an added fats adaptation but only includes “vegetable oils, margarines, butter, cream or dairy products.”</td>
<td>NS has a “Cheese” adaptation</td>
<td>NS has an added “Beverages” adaptation</td>
<td>No adaptation currently scored under Solid or liquid foods. However, the algorithm does not differentiate the products well enough</td>
</tr>
<tr>
<td><strong>Alignment with schemes (EFSA, EU Pledge, Choices and Keyhole)</strong></td>
<td>All schemes have fats group, and includes spreadable fats and emulsion-based sauces</td>
<td>All schemes have a dairy group, that includes cheese</td>
<td>EFSA and Choices have a product group for beverages. The other schemes include drinks in other product groups</td>
<td>EFSA is the only scheme without this product group (understandable since meals do not have claims)</td>
</tr>
<tr>
<td><strong>Action recommended</strong></td>
<td>All added fats to be included.</td>
<td>All dairy should be included in the same group.</td>
<td>Category already exists in NS</td>
<td>Further adapt the NS algorithm for ‘solid or liquid foods’ in order to have a bigger differentiation for meals/composite dishes</td>
</tr>
</tbody>
</table>
## Proposal – additional product groups

<table>
<thead>
<tr>
<th>Product groups suggestion</th>
<th>Cereals/carbs</th>
<th>Fruits &amp; Vegetables</th>
<th>Meat</th>
<th>Fish</th>
<th>Small (indulgent) products</th>
<th>Sauces/Condiments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Alignment with Nutri-score</strong></td>
<td>No adaptation currently scored under Solid or liquid foods</td>
<td></td>
<td></td>
<td></td>
<td>No adaptation currently scored under Solid or liquid foods</td>
<td>No adaptation for this product group</td>
</tr>
<tr>
<td><strong>Alignment with schemes (EFSA, EU Pledge, Choices and Keyhole)</strong></td>
<td>The name of the product group ranges from cereals to carbohydrates in the schemes, but all include this group</td>
<td>All schemes have these product groups, with very similar names and products in scope</td>
<td></td>
<td></td>
<td>EU Pledge has an “Edible ices” and Choices has “savory snacks” and “sweet snacks” product groups</td>
<td>Alignment with Keyhole and Choices International</td>
</tr>
<tr>
<td><strong>Action recommended</strong></td>
<td>Creation of NS algorithm adaption</td>
<td>Creation of NS algorithm adaption</td>
<td>Creation of NS core algorithm adaption</td>
<td></td>
<td>Other schemes include this group.</td>
<td>Other schemes include this group.</td>
</tr>
</tbody>
</table>

Standards are set on energy per portion (kcal/portion).
Summary and our recommendation

• We commit globally to provide Nutrition labelling on pack
• We support additional FOP labelling schemes that allow consumers to make healthier choices, and stimulate industry to reformulate
• FOP labelling schemes should be ‘all inclusive’ and based on portions or product group specific nutrient profiles, and not on per 100g/ml
• We propose a limited set of product groups that will allow for better alignment with dietary guidance (algorithm itself should be developed by independent scientific experts)