NOTE FOR THE ATTENTION OF MS SANDRA GALLINA
DIRECTOR GENERAL DG SANTE

Subject: Initiatives on food labelling (nutrition, origin and nutrition and ingredient labelling of alcoholic beverages) and on sustainable food systems

Further to our discussion, with this note, I would like to confirm our views on different initiatives being prepared by DG SANTE on food labelling, as well as provide some further considerations as follow-up to our latest bilateral meeting on the framework law on the sustainability of food systems, and more particularly on the labelling on food sustainability, which have a particular importance for European agriculture.

As the impact assessments are progressing, I feel it is important to ensure that sufficient time is provided for proper informed policy discussions to lead to the best possible legislative proposals. Therefore, my service and I remain at your disposal to further discuss the options and identify the best possible way forward.

1. FOOD LABELLING PROPOSALS (FRONT OF PACK NUTRITION LABELLING, ORIGIN LABELLING AND NUTRITION/INGREDIENTS LABELLING FOR ALCOHOLIC BEVERAGES)

We understand that DG SANTE is still in the process of collecting information that will underpin the impact assessment. This information will include in particular the final scientific advice of the European Food Safety Authority (EFSA) on food nutrition published on 19 April¹ and scientific reviews which are being prepared by the Joint Research Centre.

We agree that the impact assessment for this initiative should be supported by the best available scientific and technical information. However, food labelling cannot be only limited to scientific facts on food safety aspects. It needs also to reflect societal issues and take into account socio-economic considerations (e.g., fairness of price paid to farmers, food culture and traditions, etc.). Therefore, any choice needs to be preceded by a genuine policy discussion.

1.1. Mandatory front of pack nutrition labelling

On this issue, we understand that DG SANTE is considering several options based on systems already put in place on a voluntary basis in some Member States, but that so far, no decision has been made.

We are aware that a colour code system such as Nutriscore is the preferred choice of consumers’ associations and is also supported by a wide range of retailers and multinational food companies. On the other hand, we are also aware of the shortcomings and the limits of the Nutriscore which are also acknowledged by the scientists behind this system\(^2\). Even France, where Nutriscore originated, seems to have recently taken a careful approach on it. We understand that France is now working with some other Member States on some improvements of the algorithm behind the Nutriscore to address a number of deficiencies in the system. It is not clear to us how this is integrated in DG SANTE’s work.

\(^2\) [Le roquefort est-il menacé par le Nutri-score?](https://www.youtube.com/watch?v=...)

\(^3\) See for example Mohammadhreza Askari *et al.* “Ultra-processed food and the risk of overweight and obesity: a systematic review and meta-analysis of observational studies” Internal Journal of Obesity

Ultra-processed food and the risk of overweight and obesity: a systematic review and meta-analysis of observational studies | International Journal of Obesity (nature.com)

See also [Ultra-processed foods, diet quality and human health](https://fao.org)

\(^4\) We understand that BEUC intended to call for it as well.
1.2. Origin labelling

The revision of the food information to consumers’ regulation includes also a possible extension of mandatory origin labelling to a range of additional products notably milk and milk used as an ingredient, meat used as an ingredient, rabbit and game meat, rice, durum wheat used in pasta, potatoes and tomato used in certain tomato products.

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As you are no doubt aware, in the context of the revision of the marketing standards we are also working on the revision of origin labelling for some agricultural products such as honey blends, pulses or dried fruits in order to respond to demands from stakeholders (Member States, consumers). As for the revision of the food information to consumers regulation, for the revision of the marketing standards we are still at the level of the impact assessment.

1.3. Nutrition and ingredients labelling for alcoholic beverages

With respect to the new labelling provisions envisaged for alcoholic beverages, as you know, the issue of mandatory nutrition and ingredients labelling for wine and aromatised wine products was settled during the negotiation of the new Common Agriculture Policy. The co-legislators introduced new provisions in the Common Organisation of the Market for Agricultural Products requiring that at least the energy value (kilocalories/kilojoules) and the allergens (status quo) must be indicated on the label while the full nutrition declaration and the ingredient list may be provided off-label by electronic means.

Any legislation affecting wine production and marketing is always politically highly sensitive and mobilises Member States, Members of the European Parliament and stakeholders as shown by the recent debate in the European Parliament on the adoption of the resolution on strengthening Europe in the fight against cancer.

This political agreement on labelling regarding wine and aromatised wine products takes account of the specificities of the product and the interests of all concerned parties, including consumers, and we believe that this political agreement should not be undone. Therefore we consider that maintaining the status quo and refraining from reopening the discussion is a must.
2. LEGISLATIVE PROPOSAL ON SUSTAINABLE FOOD LABELLING

As communicated on other occasions, we consider that the sustainable food labelling initiative being developed as part of the framework law on the sustainability of food system represents a unique opportunity to empower consumers to make informed choices about the food they buy and, at the same time, support farmers in a fair and just transition towards more sustainable food systems.
In absence of the Director General
Wolfgang BURTSCHER

Mihail DUMITRU
Deputy Director General

c.c.: Mihail Dumitru, Michael Scannell, Tassos Haniotis, Pierre Bascou, John Clarke,

Electronically signed on 24/06/2022 17:15 (UTC+02) in accordance with Article 11 of Commission Decision (EU) 2021/2121