BTO – Transnational governance of Nutri-Score: "Complementing food based dietary guidelines—chances and challenges of a harmonised front of pack nutrition labelling"

21 October 2022, 10-12:30h

Max Rubner-Institut: Front of pack nutrition labelling and food based dietary guidelines—complementary tools towards a common goal

- Presented the EU regulatory framework and the different formats of front-of-pack nutrition labelling (FOPNL) schemes.
- Presented the impact of FOPNL schemes on consumers in terms of understanding, attention, preference and purchasing behavior.
- Explained that the conclusions of the updated JRC literature review from 2022 confirm the findings of the 2020 literature review that FOPNL helps consumers to make healthier food choices.
- Explained the purpose of food-based dietary guidelines (FBDGs) and their commonalities/differences across the EU.
- Gave examples of the application of FOPNL and FBDGs:
  - FOPNL applies largely at product level and guides consumers at the point of purchase.
  - FBDGs apply largely at overall diet level and guide consumers for diet and meal planning.
- Concluded by stating that both FBDGs and FOPNL are tools that can help consumers make healthier food choices (directly by guiding individual behavior or indirectly by shaping health-promoting food environments); however, FBDGs and FOPNL have different objectives and they cannot replace each other although they can overlap in their information/message.

BEUC: Consumer’s perspective

- Explained that FOPNL is only one part of the solution and that food environments need to enable healthier choices.
- Presented what FOPNL should look like for consumers: government-led development, easily understood at-a-glance, interpretive, meaningful colour codes, uniform reference amount, based on solid independent scientific evidence and mandatory.
- Explained that a 100g reference amount should be used, as portion sizes are different depending on the person and manufactures can freely choose the sizes of portions.
- Explained that Nutri-Score meets all these criteria and is currently the best-performing FOPNL label, as it is the easiest label to understand, it guides consumers towards healthier choices, it makes consumers’ shopping baskets healthier, it helps consumers eat smaller portions, it incentivizes food reformulation where feasible, and it is a government-led initiative based on solid independent scientific evidence.
- Highlighted that FOPNL supplements FBDGs to provide information on product level.
- Highlighted that Nutri-Score is well aligned with the Mediterranean diet.
- Explained that ultra-processed foods do not score well under Nutri-Score (only 8% of UPF products score A and 13% B), and stressed that the degree of processing and the nutritional composition of a product are different dimensions.
• Highlighted that no system is perfect: regular systematic reviews will be needed to allow for the continuous improvement of the future EU FOPNL scheme.
• Explained that from a consumer perspective, any exemptions for traditional products should be based on public health concerns rather than commercial interests.
• Considered that digital labelling does not work for the most vulnerable population groups and explained that information needs to be provided on-label due to the current food environment (purchasing decisions within seconds).

[Scientific Committee of the Transnational Governance]: Scientific background and ongoing development of the Nutri-Score
• Presented the modifications proposed by the scientific committee of the Nutri-Score for general foods and “fats, oils, nuts, seeds”.
• Explained the methods used to update the algorithm. The Scientific Committee:
  o Analysed current systems/classifications, compared the system to FBDGs and conducted a literature review to find areas of improvement.
  o Prioritized food groups (across the board system – any modifications in one area would affect all other food groups).
  o Reviewed each of the components and considered scenarios for revisions based on reference values in the FIC or Claims Regulation.
  o Tested combinations and defined thresholds for Nutri-Score: aimed to have as many colours as possible in each of the food groups and alignment with FBDGs, and checked whether indicator foods were in the right position in the algorithm.
• Presented the main areas of improvement:
  o Fish and fatty fish (alignment between classification of lean and fatty fish);
  o Discrimination between wholegrain and refined grain bread (based on fibres and salt content);
  o Discrimination between plant-based oils (according to fatty acids composition);
  o Discrimination of products based on sugar content (high sugar products, dairy products and breakfast cereals);
  o Discrimination between red meat and poultry (alignment with their relative positions in FBDGs – red meats to be limited).
• The final modifications included:
  o An update of all components, except for energy and saturated fats. The other components were aligned with the reference labels set in the FIC and Claims Regulation.
  o An update of the overall computation and the final thresholds.
• Presented examples of the updated algorithm: sweetened dairy products move from B to C, red meats moved to lower scores, increased discrimination for cheeses based on salt content, shift for ready meals e.g. frozen pizza moves to D.
• Presented the next steps, i.e. to work on an update of the algorithm for beverages (before the end of the year) and on a clarification of the fruit components.

[Ministry of Agriculture and Forestry Finland]: Synergy of front of pack nutrition labelling and food based dietary guidelines tools – Member State’s perspective
• Presented the Finnish nutrition problems, the FBDG tools and policy options to encourage healthier diets in use in Finland, the voluntary Heart Symbol, and the way forward to move towards a healthy food environment for all.

• Presented the “high in salt”-label, which is mandatory in Finland since 2014 and applies to food categories that contribute significantly to the intake of salt from industrially produced foods.

• Presented the voluntary FOP nutrition label “Heart-symbol”, which indicates the “better choices” in a food group and is owned by the Finnish Heart Association. The use of the logo costs 500 euro/per year/ per product. The Heart Symbol criteria focus on salt intake and fat quality and are based on nutrition profiles (based on dietary guidelines) for different product categories.

• Considered that the Finnish FOPNL could co-exist with the EU harmonized label, as long as both labels communicate the same message.

Permanent Representation of Italy: Considered that the narrative to give consumers more information and time to make the right choices should be more widely supported. Considered that Nutri-Score is boosting impulsive, rather than educated food choices. Stated that the use of QR-labels for FOPNL should be considered.

Permanent Representation of Luxembourg: Supports labelling for non-prepacked foods, in particular calorie/ menu labelling in fast food establishments.

France: Explained that Nutri-Score is a private brand owned by the French public health agency and is in transnational use in the countries of the Steering Committee. Explained that France is considering an extension of Nutri-Score to non-prepacked food products but that other participating countries would not be obliged to follow this decision.

Germany: Explained that the Steering Committee has adopted the recommendations from the Scientific Committee and will need to modify the law. Supports the considerations to use FOPNL on non-prepacked foods.