

**From:** [REDACTED] (CAB-KYRIAKIDES) on behalf of KYRIAKIDES Stella (CAB-KYRIAKIDES)  
**Sent:** jeudi 4 juin 2020 13:28  
**To:** CAB KYRIAKIDES ARCHIVES; [REDACTED] (CAB-KYRIAKIDES); [REDACTED] (CAB-KYRIAKIDES)  
**Subject:** FW: Copa-Cogeca's letter on the concerns regarding the introduction of mandatory front-of-pack nutrition labelling in the EU  
**Attachments:** CC(20)3635EN[1].pdf  
**Categories:** Yellow Category

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**From:** [REDACTED] <[\[REDACTED\]@copa-cogeca.eu](mailto:[REDACTED]@copa-cogeca.eu)>  
**Sent:** Thursday, June 4, 2020 11:44 AM  
**To:** KYRIAKIDES Stella (CAB-KYRIAKIDES) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>  
**Cc:** WOJCIECHOWSKI Janusz (CAB-WOJCIECHOWSKI) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED] (SANTE) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED] (SANTE) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>  
**Subject:** Copa-Cogeca's letter on the concerns regarding the introduction of mandatory front-of-pack nutrition labelling in the EU

Dear Commissioner Kyriakides,

For your attention, please find attached Copa-Cogeca's letter on the *concerns regarding the introduction of mandatory front-of-pack nutrition labelling in the EU*.

Your sincerely,

On behalf of [REDACTED]  
[REDACTED]

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CC(20)3635:1 – BME/rs

Ms Stella Kyriakides  
Commissioner for Health and  
Food Safety  
European Commission  
Rue de la Loi 200  
BE-1000 Brussels

Brussels, 4<sup>th</sup> June 2020

**Re: Concerns regarding the introduction of mandatory front-of-pack nutrition labelling in the EU**

Dear Commissioner Kyriakides,

Following the recent publication of the Commission's Communication on the Farm to Fork Strategy as well as the Commission Report regarding the use of additional forms of expression and presentation of the nutrition declaration, Copa-Cogeca, the European association acting as the voice of European farmers and agri-cooperatives, would like to share with you their concerns regarding the introduction of mandatory front-of-pack nutrition labelling (FOPNL) in the EU.

The European farming community welcomes any measure encouraging consumers to adopt a diet that ensures their good health. We believe that a balanced diet constitutes one of the essential elements required to build the robust foundations of a healthy life-style. Farmers and agricultural cooperatives welcome the opportunity to support this objective and believe that the high nutritional quality of the food they produce can contribute to it. However, it is vital to ensure that any new type of nutrition labelling truly helps consumers in making healthy food choices and does not end up misleading them, disturbing the market, discriminating healthy products or penalising other products that are the result of our cultural heritage and which the European Union has made great efforts to promote.

The recently published Commission Report regarding the use of additional forms of expression and presentation of the nutrition declaration seems to support the use of a colour-coded system for FOPNL. We would like to point out the many shortcomings and risks linked to the use of a colour-coded FOPNL like Nutri-Score. This type of nutrition labelling system represents an overly simplistic classification of food products, differentiating between those that are "good", in green, and those that are "bad", in red. This dichotomous perspective not only discriminates against cultural and traditional products, which have their place in a balanced and diversified diet in the right proportions, but it also stigmatises highly nutritious products which are praised for their nutritional value by nutritionists all over the world, such as olive oil. Many of those products are at the heart of traditional diets revered for their health benefits such as the Mediterranean diet, and contribute to food diversity, which is a cornerstone of any balanced diet. Furthermore, this type of system also discriminates against many GI and TSG products which the EU has made great efforts to promote over the years, and which are responsible for its culinary renown around the world. FOPNL should support consumers in making an informed choice when it comes to buying a variety of products which, when combined in the right proportions, based on their own tastes and preferences, will allow them to have a balanced diet. It should not impose food choices.

We also believe that in order to benefit consumers and actively support them in choosing food products that contribute to their own specific balanced diet, any FOPNL should be science based. It should be designed by an independent and scientific organisation such as EFSA, and follow dietary guidelines, also established by an independent scientific agency.

Copa-Cogeca would also like to insist on the importance of FOPNL taking into account the complexity of food products when establishing their nutritional contribution. Indeed, every food and drink product contains different macronutrients and micronutrients. When establishing a nutritional labelling system, a complete evaluation of the food should be carried out which does not concentrate exclusively on certain nutrients. By only focusing on a very limited number of nutrients (e.g. sugar, fat and salt) and the energy intake, we end up setting aside nutritiously valuable food products such as honey and promoting unhealthy ones such as aspartame based diet soft drinks.

If FOPNL is to be introduced in the all EU, we wholeheartedly agree that it should be harmonised at EU level to avoid any market disturbances and causing confusion or mistrust among consumers. However, in opposition to the Commission's Communication on the Farm to Fork Strategy published on Wednesday 20 May, and in line with the statement you made during the exchange of views with the AGRI Committee on 11 May, we believe that any FOPNL system that is introduced should be voluntary. Indeed, an additional labelling scheme could increase costs and heighten the administrative burden for operators in the food chain. In addition, some products, especially those with natural ingredients like dairy products, meat or fish, may vary slightly from one batch to another and over seasons (due to the nature of the product or the farming conditions, etc.), making it difficult to apply the same FOP label to all the products within that category. Only industrially processed products can have the same exact nutrient content every time. Therefore, it should be left to the operators in the food chain to establish whether it is relevant and coherent to apply FOP labelling or not.

Finally, we would like to emphasise that FOPNL cannot by itself guide consumers towards healthier eating habits. If we want consumers to adopt healthy diets and eating habits, we need major nutritional education and awareness-raising campaigns, starting at the earliest possible age. These education campaigns should also underline that a healthy diet is only one side of the coin when it comes to ensuring good health. A balanced diet should always be coupled with physical activity and a healthy overall life-style.

We call on you to adopt a FOPNL scheme that will truly benefit consumers' health and is objective, refrains from discrimination and does not mislead consumers, as stated in Article 35 of Regulation (EU) No 1169/2011.

Yours sincerely

[Redacted]  
Copa and Cogeca

Cc: Mr Janusz Wojciechowski, Commissioner for Agriculture  
[Redacted], Director-General DG SANTE  
[Redacted], [Redacted] E1 DG SANTE