

# Nutrition labelling & Front-of-Pack labelling

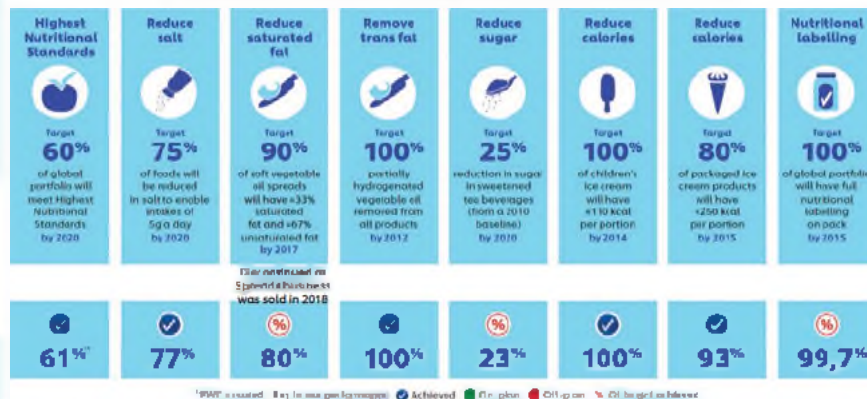
Unilever Perspective



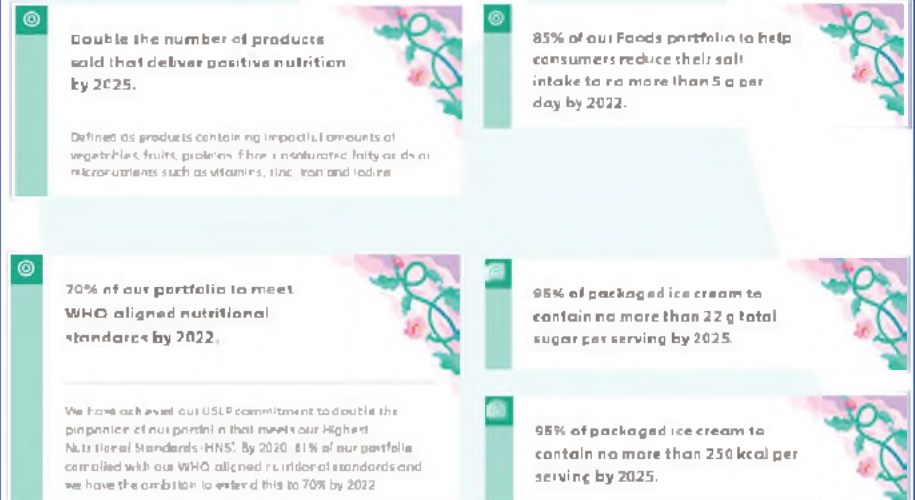
# Nutrition Labelling commitment is part of broader agenda in responsible products

## Unilever Sustainable Living plan 2010-2020

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



## Unilever Future Foods nutrition commitments 2020-2025



[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.



**'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.

- 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

## 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

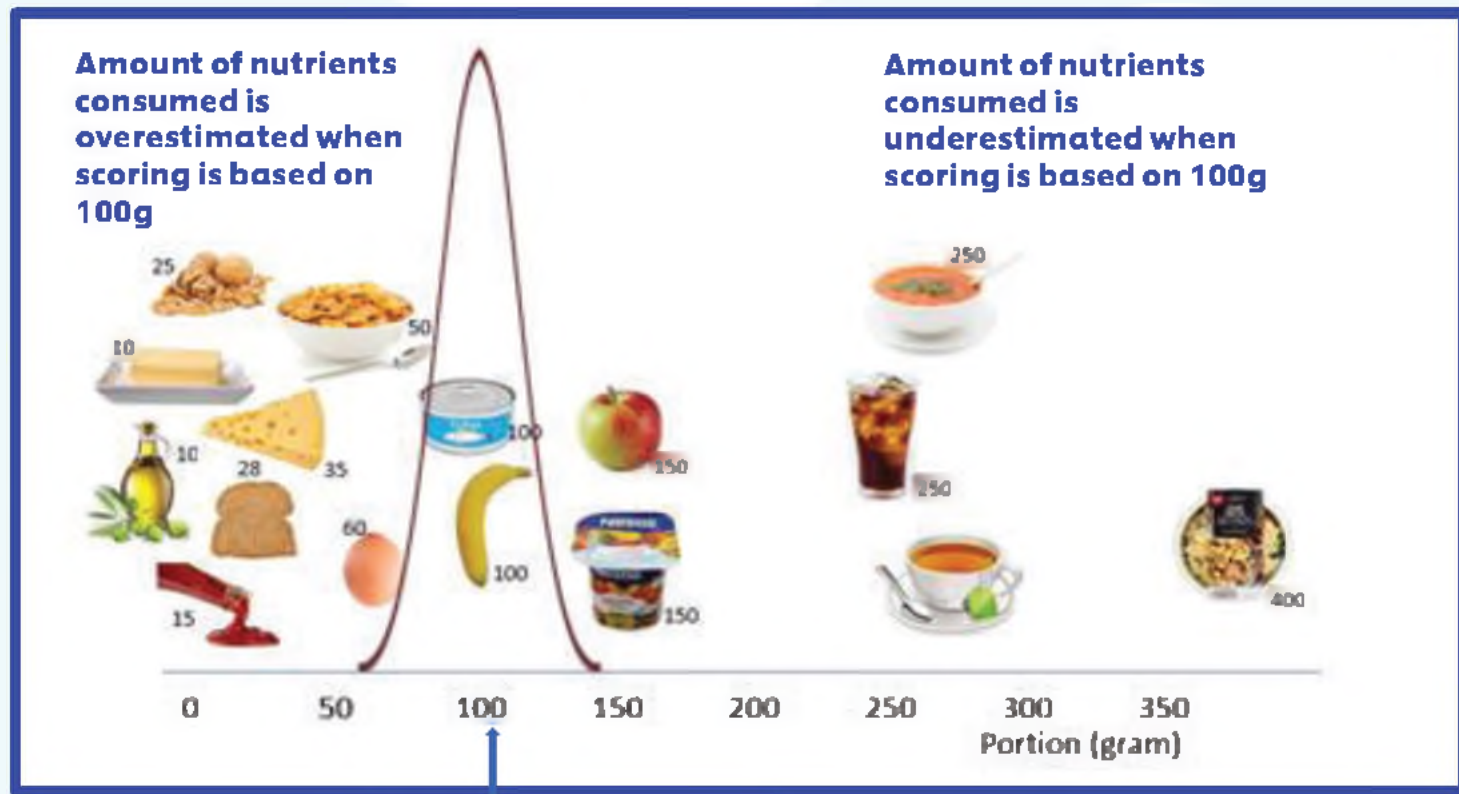
Our principles are best reflected if the algorithm underlying FOP labelling schemes are **product group specific** or **based on regulated portions**, and not based on 100g/ml

### 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



portion = 100g



# Why we support nutrient profiling based on portions or product group specific criteria

## Need to provide insight in right portion size

### Portion Distortion



Intervention group	Estimated impact across pop. population	Estimated average cost per DALY	Strength of evidence rating
Portion control	2,128	400	■ ■ ■ ■ ■
Information	1,759	2,400	■ ■ ■ ■ ■
High calorie food/beverage availability	1,137	200	■ ■ ■ ■ ■
Weight management programs	967	1,300	■ ■ ■ ■ ■
Parental education	962	2,000	■ ■ ■ ■ ■
School curriculum	888	600	■ ■ ■ ■ ■
Healthy meals	858	14,200	■ ■ ■ ■ ■
Burgery	610	2,000	■ ■ ■ ■ ■
Labeling	571	1,000	■ ■ ■ ■ ■
Price promotions	561	200	■ ■ ■ ■ ■
Pharmaceuticals	474	6,600	■ ■ ■ ■ ■
Media restrictions	401	90	■ ■ ■ ■ ■
100% tax on high-sugar high-fat products	2,200	1,400	■ ■ ■ ■ ■
Workplace wellness	129	2,700	■ ■ ■ ■ ■
Active transport	37	21,400	■ ■ ■ ■ ■
Public health campaigns	49	200	■ ■ ■ ■ ■

**Portion control has the biggest impact on obesity levels**

McKinsey Global Institute Nov 2014 "Overcoming Obesity: an initial economic analysis"

## Product group specific criteria work best

Open

European Journal of Clinical Nutrition (2019) 44, 553–567  
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### ORIGINAL ARTICLE

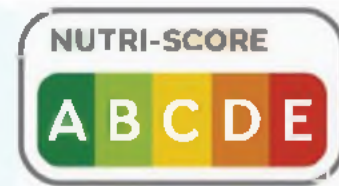
**Should nutrient profile models be 'category specific' or 'across-the-board'? A comparison of the two systems using diets of British adults**

P. Scarborough<sup>1</sup>, G. Arambebe<sup>2</sup>, A. Kain<sup>1</sup>, P. Fhatthagar<sup>1</sup> and M. Rayner<sup>1</sup>

### 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



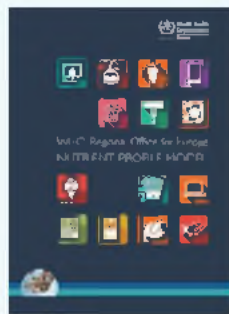
We support the visual expression of Nutri-Score, however we believe that the algorithm underlying Nutri-Score should be adjusted:

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



## 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

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

## Proposal – additional product groups

Product groups suggestion	Cereals/carbs	Fruits & Vegetables	Meat	Fish	Small (indulgent) products	Sauces/ Condiments
<b>Alignment with Nutri-score</b>	No adaptation currently scored under Solid or liquid foods				No adaptation currently scored under Solid or liquid foods. Portion are not taken into account	No adaptation for this product group
<b>Alignment with schemes (EFSA, EU Pledge, Choices and Keyhole)</b>	The name of the product group ranges from cereals to carbohydrates in the schemes, but all include this group	All schemes have these product groups, with very similar names and products in scope			EU Pledge has an “Edible ices” and Choices has “savory snacks” and “sweet snacks” product groups	Alignment with Keyhole and Choices International
<b>Action recommended</b>	Creation of NS algorithm adaption.	Creation of NS algorithm adaption	Creation of NS core algorithm adaption.  Suggest that plant-based alternatives be included.		Other schemes include this group.  Standards are set on energy per portion (kcal/portion )	Other schemes include this group.

## **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)**