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FEDIOL position
Towards an adapted Nutriscore for bottled vegetable oils and fats

Context
FEDIOL has been engaged in discussions and has followed the developments on nutrient profiles for many years.

FEDIOL understands the need to introduce a food labelling system such as the Nutriscore to push consumers to favour rated "healthier" food.

Hence, **FEDIOL can support such initiatives as long as**:

1) **it provides meaningful information to consumers;**
2) **it enables bottled vegetable oils and fats to get a scoring across the whole possible range from "A" to "E";**
3) **it enables all food products – including vegetable oils and fats - to improve their "score", even if challenging, through reformulation.**

FEDIOL has therefore assessed such system in detail[1], including the last modifications introduced in September 2019[2]. For bottled vegetable oils and fats, the scoring is ranging from "C" to "E". A detailed explanation is available in Annex I.

FEDIOL welcomes the recent modifications of the Nutriscore[3], which recognises positive effects on health from rapeseed oil, walnut oil and olive oil, by including them in the positive category "Fruits and vegetables, legumes, nuts, rapeseed oil, walnut oil and olive oil"[4]. As a result, olive oil and walnut oil can now bear a "C" scoring, instead of "D", whilst for rapeseed oil nothing changes, it stays in category "C".

Whilst FEDIOL welcomes this approach as a step in the good direction, **it has limited impact on the differentiation of bottled vegetable oils and fats. Indeed, it still classifies all vegetable oils and fats only between "C" and "E", and none under "A" or "B".**

However, by this change, it will be possible to have a positive impact on a processed composite food product containing oil/fat by replacing "D" or "E" ranked oils/fats with "C" ranked vegetable oils and fats and thereby improve its final score.

[1] FEDIOL position on Nutriscore, April 2019, 19NUT079.
[2] Arrêté du 30 août 2019 modifiant l'arrêté du 31 octobre 2017 fixant la forme de présentation complémentaire à la déclaration nutritionnelle recommandée par l'Etat en application des articles L. 3232-8 et R. 3232-7 du code de la santé publique, JORF n°0206 du 5 septembre 2019 texte n° 6.
[3] Ibidem footnote 2.
[4] By this, olive, rapeseed and walnut oils benefit from 5 additional positive points.

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Why the Nutriscore does not fit bottled vegetable oils and fats in practice

The current Nutriscore does not fit bottled vegetable oils and fats for the following main reasons:

1) **It does not offer consumers a better bottled vegetable oil/fat alternative than "C".**

Despite the positive points, the system does not enable to re-balance the other negative components. Vegetable oils will hence fall in categories "C" (light orange), "D" (orange) or "E" (dark orange), but never in the green categories "A" or "B".

Therefore, the existing Nutriscore system does not enable to sufficiently differentiate botted vegetable oils and fats within the entire category and across the sub-categories defined by the current scoring.

2) **It suggests to eat "less frequently" vegetable oils and fats rated "C" or "D", which should be <u>on the contrary</u> favored according to WHO and national nutrition guidelines.**

WHO recommends replacing butter, lard and ghee with oils rich in polyunsaturated fats, such as canola (rapeseed), sunflower, soybean, corn and safflower oils to lower the risk of developing non-communicable diseases[5].

It further contradicts what WHO considers as core/basic products[6] whereby vegetable oils and fats are *recommended to be consumed as part of a healthy diet in most national nutrition guidelines*.

And hence, it is not in line with national nutrition guidelines such as in France[7], which recommend to <u>favour</u> olive, rapeseed and walnut oils, whilst a "C" or "D" Nutriscore means that such vegetable oils are to be eaten "less frequently".

3) **It does not create a suitable environment for consumers to favour polyunsaturated fat content in the diet.**

Polyunsaturated fats (PUFA) are recognised for having proven benefits in a healthy diet. They can come from different sources, **one of the main contributors in several countries is vegetable oils and fats high in PUFA**. This is why they are recommended by national nutrition guidelines in the context of a healthy diet.

Ranking as "C" or "D" known vegetable oils high in PUFA as defined under EU health claim[8] will not result in consumers favouring a vegetable oil high in PUFA over another one.

4) It creates a **discrimination for bottled vegetable oils and fats *vs.* vegetable oils and fats used as an ingredient in processed food products.**

[5] WHO factsheet on healthy diet, updated October 2018. https://www.who.int/news-room/fact-sheets/detail/healthy-diet

[6] Kelly B and Jewell J. What is the evidence on the policy specifications, development processes and effectiveness of existing front-of-pack food labelling policies in the WHO European Region? Copenhagen: WHO Regional Office for Europe; 2018 (Health Evidence Network (HEN) synthesis report 61).

[7] Les matières grasses ajoutées – huile, beurre et margarine – peuvent être consommées tous les jours en petites quantités. Privilégiez l'huile de colza, de noix et d'olive. Recommandations relatives à l'alimentation, à l'activité physique et à la sédentarité pour les adultes. Saint-Maurice : Santé publique France, 2019. 62 p.

[8] A claim that a food is high in unsaturated fat, and any claim likely to have the same meaning for the consumer may only be made where at least 70% of the fatty acids present in the product derive from unsaturated fat under the condition that unsaturated fat provides more than 20% of energy of the product. Regulation (EU) No 1924/2006.

With the new changes introduced to the Nutriscore in September 2019[9], a processed food product – such as a biscuit for example – can benefit from a better score when using a vegetable oil with a better fatty acid profile like rapeseed oil for example instead of butter and hence contributing to reach a "B" score.

Getting to a "B" score for bottled oils and fats will never be possible through reformulation, as none of the individual vegetable oils and fats have a better score than "C" based on their fatty acid profile specific to their botanical origin.

Towards an adapted Nutriscore for bottled vegetable oils and fats : FEDIOL proposal

For the above reasons, FEDIOL has further looked at how to enhance the comparability of bottled vegetable oils and fats, based on scientifically recognised criteria.

FEDIOL proposes to keep the existing Nutriscore and to add the following 2 elements in the calculation of the scoring system,

1) An **extension of the recognized health benefits of those vegetable oils and fats with a "high omega 3 fatty acid[10]" profile,**
2) The **consideration of the unsaturated fatty acids content of vegetable oils and fats for those oils and fats "high in unsaturated fat[11]"**.

In addition, to ensure alignment with existing national nutrition recommendations whereby olive oil, rapeseed oil and walnut oil are recommended in a healthy diet, FEDIOL proposes an adaptation of the negative saturated fat ratio. Such adaptation covers olive oil only.

The detailed proposal and calculations are available in Annex II.

By this proposal, bottled vegetable oils and fats with a "high in omega 3 fatty acid" profile and "high in unsaturated fat" will reach the light green "B" score. The FEDIOL proposal does not introduce changes in the scoring system for other vegetable oils and fats not meeting such criteria.

Such FEDIOL approach:

- **is in line with EU nutrition and health claims[12] as it proposes criteria from such EU Regulation, which have been subject to EFSA positive assessment,**
- **enables to offer consumers with a range of bottled vegetable oils and fats, ranging from "B" to "E", for a meaningful and informed consumer choice,**
- **is aligned with the existing national and international nutritional recommendations.**

FEDIOL stands ready to further discuss with relevant authorities.

[9] Ibidem footnote 2.
[10] A claim that a food is high in omega-3 fatty acids, and any claim likely to have the same meaning for the consumer, may only be made where the product contains at least 0,6 g alpha-linolenic acid per 100 g and per 100 kcal, or at least 80 mg of the sum of eicosapentaenoic acid and docosahexaenoic acid per 100 g and per 100 kcal. Regulation (EC) No 1924/2006 on nutrition and health claims made on food.
[11] Ibidem footnote 8
[12] Regulation (EC) No 1924/2006 on nutrition and health claims made on food as further amended.

Annex I: Nutriscore – category of "Added fats and oils"						
Fruits and vegs, legumes, nuts, rapeseed oil, walnut oil and olive oil	Fibres	Proteins	Energy	SAFA (ratio SAFA/total fat content)	Sugar	Salt
5 positive points for bottled rapeseed oil, walnut oil and olive oil	0 positive point for bottled vegetable oils and fats	0 positive points for bottled vegetable oils and fats	>3,350 kJ =10 negative points	<10: 0 negative point <16: 1 negative point <22: 2 negative points <28: 3 negative points <34: 4 negative points <40: 5 negative points <46: 6 negative points <52: 7 negative points <58: 8 negative points <64: 9 negative points ≥64: 10 negative points	0 negative point for bottled vegetable oils and fats	0 negative point for bottled vegetable oils and fats
Differentiation between bottled vegetable oils and fats is possible here. **But this is not enough to enable a more differentiated comparison within the vegetable oil and fat category.**	Bottled vegetable oils and fats do not contain fibres. **Hence, all will have the same zero score.**	Bottled vegetable oils and fats do not contain proteins. **Hence, all will have the same zero score.**	Bottled vegetable oils and fats all contain the same amount of energy of 3,700 kJ or 900 kcal per 100 g. **Hence, all will get 10 negative points.**	Differentiation between bottled vegetable oils and fats are mainly possible here. **But this is not enough to enable a more differentiated comparison within the vegetable oil and fat category.**	Bottled vegetable oils and fats do not contain sugar. **Hence, all will have the same zero score.**	Bottled vegetable oils and fats do not contain salt. **Hence, all will have the same zero score.**
All bottled vegetable oils and fats assessment will only vary depending mainly on the characterisation under the ratio SAFA/total fat content and the positive points. They will hence fall in categories ranging from C (light orange), D (orange) or E (dark orange) and despite the positive points, they will never reach A (dark green) or B (light green).						

Annex II: FEDIOL Proposal to adapt the Nutriscore for bottled vegetable oils and fats: Adding a new positive "P" criterion of unsaturated fat and modifying the existing positive criterion

The negative "N" criteria of energy and saturated fat ratio are kept as per the existing Nutriscore for the category added fats and oils.

The FEDIOL proposal can be summarised as follows:
(Original Energy + Adapted Saturated fat ratio*) – (Extended positive criteria + NEW positive criteria of Unsaturated Fat) ** only applicable for olive oil*

1.1. Extending the existing positive criteria of "fruits and vegetables"

What it entails:
Building upon the French government decision to include rapeseed, olive and walnut oils in the positive category "Fruits and vegetables, legumes, nuts, rapeseed oil, walnut oil and olive oil", FEDIOL suggests broadening the category to include "vegetable oils high in omega 3". This would cover those vegetable oils "high in omega 3", as defined by the EU health claim "high omega 3 fatty acids"[13] as follows: camelina oil, linseed oil, soybean oil and mustard oil. This will enable to further differentiate between vegetable oils and fats whilst taking into account the recognised benefits of omega 3 fatty acids.

Rationale: Following EFSA assessment[14], health benefits of alpha-linolenic acid (ALA) have been recognised as contributing to the maintenance of normal blood cholesterol levels[15], with a daily intake of 2 g of ALA, for food being at least a source of ALA as referred to in the claim "source of omega 3 fatty acids" as listed in the Annex to Regulation (EC) No 1924/2006.

In addition, a nutrition claim of "high omega 3 fatty acids" is authorised under EU law[16].

FEDIOL is therefore suggesting adding in the positive "P" category those vegetable oils, which are meeting the criteria of "high omega 3 fatty acids" as listed in the Annex to Regulation (EC) No 1924/2006. Those oils would be attributed 5 positive points.

1.2. Adding a NEW positive criterion of "Unsaturated fat"

What it entails:
FEDIOL considers that the content of unsaturated fat should be further used as a criteria to differentiate between vegetable oils and fats, given the recognised benefits of unsaturated fat.

Rationale: Following EFSA assessments, the following health benefits have been recognised for unsaturated fatty acids and authorised by EU law as follows:

- *Replacing saturated fats with unsaturated fats in the diet contributes to the maintenance of normal blood cholesterol levels.*[17]

[13] Ibidem footnote 11.
[14] http://www.efsa.europa.eu/en/efsajournal/doc/2203.pdf; http://www.efsa.europa.eu/en/efsajournal/doc/1252.pdf
[15] EU health claim recognised under Commission Regulation (EU) 432/2012 of 16/05/2012.
[16] Ibidem footnote 11.
[17] https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.2203 ; https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.2069

- *Replacing saturated fats with unsaturated fats in the diet has been shown to lower/reduce blood cholesterol. High cholesterol is a risk factor in the development of coronary heart disease.*[18]
- *Replacing saturated fats in the diet with unsaturated fats contributes to the maintenance of normal blood cholesterol levels. Oleic acid is an unsaturated fat.*[19]

FEDIOL therefore proposes to further consider the benefits of unsaturated fats to differentiate between vegetable oils and fats, in allocating them the following points:

Unsaturated in line with " high unsaturated fat" nutrition claim	
Points allocated	UFA (UFA content per 100 g)
0	content ≤ 70
1	70 < content ≤ 75
2	75 < content ≤ 80
3	80 < content ≤ 85
4	85 < content ≤ 90
5	90 > content

1.3. Adapting the existing negative saturated fat ratio for olive oil

What it entails:
The existing Nutriscore criteria for saturated fat ratio is adapted, insofar as no negative point is allocated in case the vegetable oil or fat has a ratio of saturated fat content below 17%. As such it broadens to <17 instead of <10 the threshold for which no negative point is allocated for vegetable oils and fats. In practice, **it only affects olive oils**, for which no negative point from the saturated fat ratio would be allocated (currently 1 to 2 negative points can be allocated to olive oils).

Rationale: National nutrition guidelines recommend the consumption of olive oils, rapeseed oils and walnut oils[20] in a healthy diet. It is therefore important that all those oils get the same score. Because of the existing saturated fat ratio threshold, olive oil gets negative points, despite its low content in saturated fat. The below proposal therefore suggests to re-equilibrate this point.

ADAPTED saturated fat ratio	
Number of points allocated	Ratio saturated fat/total fat
0	**<17 (instead of <10)**
2	<22
3	<28
4	<34
5	<40
6	<46
7	<52
8	<58
9	<64
10	≥64

[18] https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.2168
[19] https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.2043
[20] Ibidem footnote 7.

1.4. Outcome of FEDIOL proposal in terms of Nutriscore scoring

With the FEDIOL proposal, vegetable oils and fats can be differentiated within their category, taking into account their intrinsic characteristics based on scientifically recognized evidence and in line with EU authorized health and nutrition claims.

	Nutriscore (incl. September 2019 modifications) with the "P" component for olive oils, nut oils and rapeseed oils	**FEDIOL proposal**
Rapeseed oil	C	B
Sunflower oil*	C D	C
High oleic sunflower oil*	C	C
Olive oil	C	B
Soybean oil*	C D	B
Coconut oil	E	E
Corn oil*	C D	C
Palm oil*	D	D
Walnut oil*	C	B
Butter	E	E
Lard	D	D
Linseed oil*	C	B
Grapeseed oil*	C D	C
Sesam oil*	C D	C
Avocado oil*	C	C
Peanut oil*	D	C
Camelina oil*	C	B
Mustard oil*	D	B

**It should be noted that the fatty acid profile of each oil naturally varies depending on their botanical origin, as well as climate and environment. Instead of a fixed number, the Codex alimentarius standard on named vegetable oils and fats provides for ranges. Depending on the exact numbers used for the fatty acid profile of vegetable oils and fats, the rating can vary and hence, change the scoring.*