



Confidential – do not circulate
Note for DG Santé – May 2021

Harmonised Front-of-pack Nutrition Labelling (FOPNL) Systems

Bel Group Position

May 2021

Bel Group

Bel is an **international family-owned business** currently led by the **fifth generation** of family managers.

Bel is a **world leader in portioned cheese** and a major global player in **healthy snacks**, thanks to over **30 international and local brands**, including the iconic Laughing Cow®, Kiri®, Mini Babybel®, Boursin® et, since 2016, Pom'Potes® and GogoSqueeZ®.

More than **30 production sites** around the world and **12, 510 employees** produced and sold **19 billion portions** in 2019, in more than **100 countries**. Group sales in 2019 were worth €3.4 billion.

Bel committed to sustainable development over 15 years ago. The Group's mission "**Champion Healthier and Responsible Food for All**" aims to roll out a sustainable and profitable model that places the consumer and shared valued creation at the heart of its decisions. This new mission anchors responsibility, nutritional superiority and accessibility as the main bases for development in the Group's product offering. Our action is centered on five strategic areas, containing specific, dated indicators: healthier food, improving the accessibility and affordability of our products, sustainable farming, responsible packaging and fighting climate change.

Bel nutrition policy

Context

Bel offers consumers the benefits of dairy products through its safe, high quality products. Three of our five core brands are primarily for children. In France, Bel products are present in more than one in two refrigerators. The portion format has been Bel's signature for over 150 years and plays an essential role: it conserves taste and sanitary qualities, ensures just the right quantity of product to respond to nutritional needs and prevents food waste. Furthermore, the portion format is convenient for out-of-home consumption, as part of meals or as part of a balanced snack. Indeed, small quantities of cheese (e.g. 15/20g) can form an interesting part of snacking occasions, since its high protein and fat content give a sensation of "fulness" relatively quickly despite the small quantity, and there are very few "empty" calories (e.g. refined sugars). In this way, our products combine nutritional benefits, pleasure, and practicality.



More broadly, cheeses are included in national dietary recommendations across the EU, either as part of the wider dairy category or specifically as cheeses in some countries. In France, for example, it is recommended that children consume 3-4 dairy products per day, and adults 2 dairy products per day.

For all these reasons, we are convinced that Bel dairy products have a key role as part of healthy balanced diets.

Our policy

Today, we're facing two crucial issues: On one hand, nutritional issues are multiple: overweight, obesity, cardiovascular disease (CVD) are growing everywhere while deficiencies still exist¹.

On the other hand, consumers are looking for more natural products, with short ingredients lists and the assurance that there's no ingredient they might perceive as harmful.

The Group is working to address current and future nutritional challenges by adapting its recipes and formats in accordance with the nutritional needs of the local population, and consumers' expectations. We want every portion produced by Bel to reflect our commitments.

1. To **improve the nutritional composition** of our portions, Bel is continuously adapting its recipes.
 - Using WHO recommendations, expert advice and local conditions and epidemiological data, we have developed a nutritional profiling system to ensure that our products bring sufficient calcium and protein without being too high in fat, salt or sugar. We call it "Bel Nutri+".
 - Our goal is that 80% of our portfolio aimed at children and families is "Bel Nutri+ compliant by 2025 (to date we 72% of these products are compliant).
 - Already since 2012, more than 312 recipes have been improved either for nutritional quality or ingredient list. To give just one example, in Europe, The Laughing Cow has reduced its salt content by 16% between 2000 and 2016.
 - We pay close attention to local recommendations and fortify our products when nutrition deficiencies are a real challenge. In 2020, we have launched a The Laughing Cow Recipe enriched in 4 essential nutrients (iron, zinc, iodine, vitamin A or D) in Morocco, Egypt and Algeria.
2. In terms of delivering **more "natural" products**, Bel is working towards simpler ingredient lists.
 - We have committed to ensuring that none of our core brand products will contain **artificial colors or flavors** by the end of 2021.
 - For example, Mini Babybel has by nature very simple recipes of just 4 ingredients.

¹ - The **prevalence of obesity** was 39.8% and affected about 93.3 million of US adults in 2015~2016. -- The estimated annual medical **cost of obesity** in the United States was \$147 billion in 2008 US dollars; the medical cost for people who have obesity was \$1,429 higher than those of normal weight

- Studies show that a majority of American children and nearly all adults are not meeting recommended dairy consumption. A large portion of Americans are not meeting Dietary Reference Intakes (DRI) for several essential vitamins and minerals found in dairy products (**Calcium, Vitamin A, Magnesium**). **Osteoporosis** and low bone mass are currently estimated to be a major public health threat for almost 44 million U.S. women and men aged 50 and older.



- In 2020 and 2021, we have launched The Laughing Cow recipe Original and Kiri square Portion in Europe with only 4 ingredients, without any additive.
- 3. We are committed to **100% non-GMO ingredients** for all our products by end 2021, and this goal has already been attained within Europe.
- 4. Bel cares about promoting healthy eating habits and lifestyles, both through the nutrition education programs we support in several countries and within Bel, and through our communications. Bel promotes mindful snacking in accordance with guidelines for healthy balanced diets, from the conception of our products to the information on healthy snacking provided to consumers both on-pack and on our websites. We are guided by Bel's responsible nutrition communication charter and are particularly attentive to our communication towards children. In this respect, Bel has been a member of the EU Pledge since 2016. Through this voluntary initiative, Bel commits to not advertising its products to children under 12 years old (television, press and digital) unless the product meets EU Pledge nutrition criteria².

Bel Group position on front-of-pack nutritional labelling

Bel is resolutely in favor of improving nutrition information for consumers. We are particularly attentive to any initiative working in this direction.

Our brands are international, so we look for the development of a harmonised EU-wide labelling regime. It must be carefully adapted for all food products, to provide the most pertinent information possible to help consumers make healthier choices in light of recommendations for a healthy balanced diet and of recommended and appropriately-adapted portion sizes.

Since Nutri-Score does not at present allow these principles to be met in a satisfactory way for cheeses, Bel does not currently apply the Nutri-Score labelling system in those countries where it exists. In the meantime, we communicate all detailed nutrition information and ingredient lists on our websites, alongside the Group policy and commitments on nutrition. Along with mandatory nutrition information, Bel includes, on-pack, suggestions for composing balanced meals.

We set out below our key principles for front-of-pack nutrition labelling (FOPNL) in more detail, illustrated with examples from the current Nutri-Score system as applied in France.

Key principles for a harmonized FOPNL for cheese

- The nutritional interest of a food or of a recipe depends on its overall composition and not only the nutrients that should be limited. An EU FOPNL system should reflect this if it is to serve its purpose of guiding consumers towards healthier diets. Cheese provides protein as well as calcium and vitamins - beneficial micronutrients which are also important for public health. The specific composition "matrix" of cheese allows for better absorption of calcium and of good fatty acid. This is why cheese forms part of dietary recommendations across Europe, either in itself or as part of

² For more details on the criteria, see [EU Pledge Nutrition Criteria White Paper](#)



the dairy category. **In order to ensure that FOPNL is as coherent as possible with recommendations for healthy balanced diets, it would be appropriate for the system to be carefully designed to reflect the benefits of cheese in terms of the nutrients it provides.**

- 1) Nutri-Score, for example, is insufficiently aligned with dietary recommendations for cheese. There is a strong correlation between the calcium and protein content of dairy products. Since calcium is not part of the mandatory nutrition declaration, it cannot be included in Nutri-Score. However, Nutri-Score only rewards protein up to 8g/100g³. Thus, Nutri-Score cannot positively reflect the high calcium content of 90% of cheeses with a protein content higher than 8g/100g. As a result, 90% of cheeses are classed as « D » on Nutri-Score's A (best) - E (worst) scale. This is the same ranking as sugary snacks or crisps, whose consumption dietary guidelines generally recommend reducing. **A score of “D” for almost all products within the category does not seem to adequately reflect the nutritional richness of cheese.**
 - 2) Furthermore, **the Nutri-score system as applied to cheese in France does not help consumers to discriminate between different cheeses**, whereas the goal of FOPNL is also to guide consumers towards better choices including *within* a given food category, in order to improve the overall basket. Indeed, within the vast majority of cheeses ranked as “D” under Nutri-Score we find the following nutrient ranges: from 13 to 40% fat, from 0,1 to 2,5% salt, from 6 to 33 % proteins, from 90 to 1000 mg of Ca/ 100g. In order to reflect the variety of nutritional content within the cheese category and thereby help consumers improve their cheese choices, the current Nutri-Score algorithm must be modified.
- **A harmonized EU FOPNL system must make room to reflect real and recommended portion sizes and not just be based on 100g of product.** This would ensure that the labelling is best adapted to real consumption habits and can thus better guide consumers towards meeting dietary recommendations. Cheese is consumed in small quantities. Thanks to its high fat and protein content and low proportion of “empty” calories like refined sugars, cheese gives a feeling of “fulness” quite quickly, such that individuals generally do not consume 100g of cheese per meal and certainly not as part of a snack (this would be 5 Mini Babybel, or 6 and a half Laughing Cow triangles!). In France, for example, the recommended portion size for cheese is 30g, and this is in fact the average consumed amount (source: Crédoc 2016). If portion sizes are not taken into account, paradoxes could occur, such as a consumer being encouraged to eat a favourably-ranked product in a quantity that in fact delivers a higher amount of fat would be delivered by the quantity of negatively-ranked cheese they are proposed in a portion format or likely to consume in reality. Establishing eating habits in early life that include appropriate portion sizes of foods which are nutrient dense and low in energy density is considered important in the prevention of obesity in children and families. Indeed, all public health recommendations in nutrition recommend to combine foods with specific portion sizes and also frequencies, in order to translate the information that will be used the most by consumers in real life. A new study from Schwartz et al (Schwartz et al., Int J Behav Nutr Phys Act. 2020; 17: 70.) showed that children anticipate the effects of portion size on hunger change accurately, overestimate the effects of portion size on eating enjoyment, and rate food healthiness on food type and not portion size. Helping children better anticipate the enjoyment from smaller (recommended) portion sizes and understand that

³ Incidentally, this seems inconsistent with the EU Nutrition and Health Claims Regulation (1924/2006) whereby the claim “contains protein” is based on at least 12% of energy coming from protein and the claim “high protein” requires at least 20% of energy to come from protein.



food quantity, not just quality, matters for healthy eating may be a solution to improve portion control. This suggests then that an education to better know the portion size of foods, with indication of nutritional information per portion in front of pack, could be a lever for a healthier diet.

- Bel would recall that one food item in itself cannot bring all the nutrients we need. That's why a balanced diet is about diversity and the combination of different food groups, adapted in frequency and serving sizes and to the individual. No food needs to be "forbidden" outright. However, a consumer study on perceptions of the color scheme showed that red is perceived as « forbidden ». Red is seen as a danger and this labelling implies that red colored food should be avoided and may be harmful. This clearly demonstrates the **need for a concerted and large-scale pedagogical accompaniment to any nutrition labelling system** to ensure a general understanding of what constitutes a balanced and healthy diet, of adequate portion sizes and adequate frequencies. Promotion of regular physical activity is also key when it comes to nutrition. Such an educational effort would be another way to help ensure coherence between labelling systems seeking to help consumer choose healthier foods and public health and nutrition recommendations.

With strong brands across Europe providing portions of dairy goodness, particularly to children, and a mission to provide healthier and responsible food for all, Bel is particularly keen to ensure its communication to consumers about its products plays a positive role in delivering healthy sustainable diets. For this reason, we want to play an active role in the development of a harmonized EU FOPNL system that is adapted to cheese products. We have been working to this end for some time, together with industry partners, and stand ready today to bring a constructive contribution to the forthcoming legislative debate.