

CLITRAVI

CENTRE DE LIAISON DES
INDUSTRIES TRANSFORMATRICES DE VIANDES DE L'UE
LIAISON CENTRE FOR THE
MEAT PROCESSING INDUSTRY IN THE E.U.

NUT/22/05_Annex_2

CLITRAVI comments to the survey on "Revision of EU legislation on Food Information to Consumers"

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CLITRAVI is the European Association for the Meat Processing Industry and represents about 13,000 (mainly small and medium sized) companies active in the production of a wide variety of meat products in the European Union.

The EU meat processing sector welcomes the public consultation about proposals for the revision of Regulation (EU) No 1169/2011 on the provision of food information to consumers (FIC Regulation) in the following areas: Front of pack nutrition labelling/ Nutrient profiling, Origin labelling, Date marking and Alcoholic beverage labelling and takes the opportunity to raise the following points.

Format of the questionnaire and oversimplification of questions

Question 1 reports the following sentences: *"Nutrition labelling on the front-of-pack is an important tool to improve the population's dietary habits"*, *"simplified and easy to understand nutrition information on the front-of-pack helps consumers to make healthier food choices"* and *"Front-of-pack nutrition labelling is an appropriate tool to incentivise food businesses to improve the nutritional content of their product"*.

We find really difficult to provide an adequate answer and simply agree or disagree with these statements.

First of all, there are many different FOPNL schemes, and it is quite impossible to express a one-fit-all judgement on their adequacy to improve the population's dietary habits or to incentivise food businesses to improve the nutritional content of their product.

As a second point we want to underline that there is not a single definition of "healthy food choice", which implies that we are not in the position to agree or disagree that a *"simplified and easy to understand nutrition information on the front-of-pack helps consumers to make healthier food choices"*.

Finally, we want to point out that the concept of healthy diet is often based on a reductive scientific methodology that favours the fragmented and isolated analysis of single foods and single nutrients out of the context of the foods and dietary patterns in which they're consumed.

This reductionist view could *de facto* lead to the preference of policy options that could not take into account many different additional elements (degree of processing of foodstuffs, nutrient density, quality of nutrients, average portion size in a balanced diet, etc.) and result as an oversimplification of a very complex and multifactorial topic.

- **Front of pack nutrition labelling and setting nutrient profiling criteria to restrict claims.**

Despite CLITRAVI supports a harmonized front-of-pack nutrition labelling for pre-packed foods, we believe that such the debate on such a scheme should be complemented with the following considerations.

- **Role of portion.** As observed by EFSA in its draft opinion ((lines 105 – 107), the reference quantity to which the nutrient content of a food is related is of great importance, as it is not only important which nutrients are used in nutritional profiling methods, but also how their contributions in the overall diet are accounted for. Many FOP-NL (i.e. Traffic light and Nutri-Score) are expressed per 100 g and **do not take into account the actual portion size of a product**. This is a first limit of those systems as they can in many cases lead to a possible over - or underestimation of the impact of products on consumer health and a distorted picture for consumers. This aspect could better explain our positions on questions 2 and 3 of the questionnaire, where we considers some schemes as not fitting for the purpose to encourage consumers to change their food purchasing behaviour neither to encourage businesses to improve the nutritional aspects of their products.

CLITRAVI believes that, as a preliminary step, **it is necessary to include portion sizes for different foods products, such as meat and meat derivatives, in nutritional profiling as well as in the definition of FOPNL schemes**.

- **Categorization of foodstuffs according to the content of cherry-picked nutrients for 100g.** Applying nutrient profiling approaches for the purpose of front-of-pack nutrition labelling and for the purpose of restricting nutrition and health claims on foods is an exercise that (as observed by EFSA too in its draft opinion) should take into account *dietary recommendations, public health considerations, generally acceptable scientific evidence on the relationship between diet, nutrition and health as well as other considerations of an industrial/commercial, cultural and dietary/culinary nature*. We believe that this is not happening in setting all the colour coded schemes, where a simplistic judgement, or even worse, a classification is based on the content of some cherry-picked nutrients for 100g/ml of product.

Such an approach could lead to strongly reduce the effectiveness of easy-to-interpret FOP-NL among different groups of consumers and would be a easy way out for

ultraprocessed foodstuffs, as playing with ingredients (replacement of sugars with synthetic alternatives, salt replacers, texturizers, flavouring agents or by adding ingredients with a healthy aureole) or with higher degree of processing (additional treatments) could better lead the food to fit into the colour scheme. But, as an adverse effect, those practices imply a high price in term of nutrient density and naturality of the food.

And without mitigating the impact on the human health in terms of healthy choices.

- **The role of the other nutrients.** Quality and density of protein as well as quantity and quality of minerals and vitamins which are reasonably consumed in a portion of a specific foodstuffs are important elements to be taken into account in the nutrient profiling model and in designing an appropriate front-of-pack nutrition labelling which can help consumers to make healthier food choices.

We recommend the inclusion of proteins, vitamins and minerals in nutrient profiling models

- **Consumers' education.** The entire debate on the front-of-pack nutrition labelling is based on a "biomass" approach, which does not take into account education, culture and the role of food in the "*European way of life*". In many cases FOPNL schemes are proposed *de facto* as a replacement to consumers' education, while the role of front-of-pack nutrition labelling should be complementary to consumers' education.

This aspect should be taken into account and consumers should be empowered to make informed choices having the adequate tools to perform those choices. By providing a tool as FOPNL without a massive education on how to read it could be another brick in the construction of a "directed" consumer rather than a conscious and informed consumer.

Once more **it is necessary to avoid pure mathematical approaches which combine the different composition of a very limited number of macronutrients**, in order to formulate a ranking of the food, therefore not taking into account essential elements such as the overall diet of an individual and cultural aspects reflected in traditional recipes and in the link with rural territories and geographical areas. The result would be an overall verdict on food, based on calculation which are often debatable and, indeed, much debated. Consumers need to make choices according to their need and an algorithm can't replace education and information to balance the choices according to personal needs.

- **Harmonized FOPNL should not be open to commercial instrumentalization and greenwashing.** While we believe that, when and where possible, reformulation is a good option to provide healthier choices, it is in any case important to take into

account that a one-fit-all approach could have a major impact on traditional product. In this sense we believe that front-of-pack nutrition label and nutrient profiles should not oblige businesses to modify their traditional, unique and iconic recipes and specifications, which are often legally compulsory and hence cannot be by-passed. Many FOP schemes, by undermining aspects different to copy or imitate such as tradition and culture, risk flattening the diversified European food cultural heritage leaving the EU motto – in varietate concordia – a dead letter. For some ultraprocessed non-traditional foodstuffs compliance with colour-coded schemes or graded logos can be easy and profitable. The replacement of traditional ingredients with different ones, as underline in the previous points, can provide a commercial advantage and a better score. This is not the case for many traditional recipes, which would be damaged by simplistic judgement irrespective to the quantity which is normally consumed in a balanced diet.

- **Date marking**

While the meat processing industry supports any policy aimed at reducing the food waste, it is important to consider that for our sector:

- **Any policy option on replace/integrate the "best before" date should take into account food safety risks.**
- **Declaring the date of production and not the best before date would not have a better impact in terms of food waste.**
- **Any policy option should leave an adequate transition period and should be supported by a strong campaign of education to consumers.**

- **Origin labelling**

The European meat processing industry supports the transparency of food information and believes that a harmonization at the EU level is necessary.

Bearing in mind that that any obligation should not result as an imposition only for a few sectors but should cover all food categories, CLITRAVI wants to underline that the origin of raw material should not be confused with food quality and safety and, to this extent, consumers need to be dully educated and well informed that the indication of origin alone is not a guarantee of quality.

The indication of the country of origin or the place of provenance has the final goal to avoid that consumer is misled on the origin of the product and/or its ingredients and, as such, it is an information to consumer and not a requisite of food safety.

The safety of food products is guaranteed as all foodstuffs placed on the EU market are to be consider safe, in accordance with the EU legislation (Regulation EC 178/2002).

It is also important to underline that origin labelling does not have any role in preventing food frauds and/or improving traceability. Origin labelling and traceability have different purposes. Traceability means the ability to track any food, feed, food-producing animal or substance that will be used for consumption, through all stages of production, processing and distribution and it is a way of responding to potential risks that can arise in food and feed, to ensure that all food products in the EU are safe for European citizens to eat.

Origin labelling does not ensure better traceability along the food supply chain, and it has nothing to do with prevention of food crises or frauds.

This is important that any future initiative will be accompanied by a massive campaign to help consumers to give the proper interpretation to information on food labels.

By taking into account all the above-mentioned points, CLITRAVI has the opinion that voluntary origin labelling is an adequate tool and that any different policy option to tighten origin labelling requirements should:

- **Be extended to any primary ingredient and not to specific categories (consumers need to know where soy is coming from as where meat is coming from).**
- **The level of precision of the indication should combine the different level of precision as already laid down in the Implementing Regulation EU 775/2018.**