Front-Of-Pack & Nutritional profiles Decathlon's position

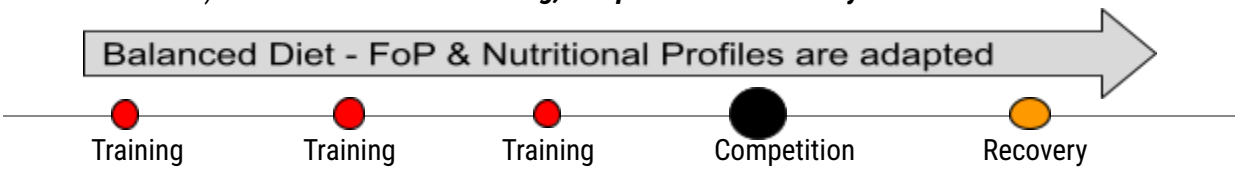
We welcome the European Commission's initiative concerning a mandatory front-of pack and the establishment of nutritional profiles. ***We expect*** that this initiative will ensure a **harmonization** across the EU and will lead to better choices by consumers. These proposals are coherent for a balanced diet but not for those specific moments in life which require specific nutrients to stay in good health. This is why ***we also call*** **for an exemption concerning products designed for intense sport practice, as it is already the case for Nutri-Score in the European governance[1].**

We request an exemption for food intended for intense sport practice

WHY? During an intense sport practice, people can be vulnerable without a proper nutrition

It has been scientifically established for several years that high-intensity effort implies specific needs regarding the diet of sportspeople before, during and after exercise. Without specific products and formulations, serious health problems can occur. Front-of-pack and nutritional profiles are very useful for better consumption within a balanced diet. They are not adapted for special moments, and namely in the context of high intensity exercise.

Indeed, poor nutrition during exercise not only has an impact on performance but also, and above all, **can cause very serious physical problems during and after exercise[2]**. In the literature, many undesirable effects have been reported as a result of a diet that is not in line with the effort made.
Front-of-pack and nutritional profiles are designed and useful for the general population but such recommendations don't make sense for athletes for whom some nutrients (like **sugar and salt)** in specific dosage are very important and vital, as proven by EFSA[3], during training and competitions (only - please see the below scheme). ***Classical scheme of training, competition and recovery*** :



= **Specific nutrition needed**, exceptional consumption, namely carbohydrates & electrolytes (to restore the muscle glycogen[4])

= **Specific nutrition needed,** exceptional consumption, namely carbohydrates & proteins (to restore the damaged muscular tissues and restore muscle glycogen).

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[1] "Similarly, we do not recommend to use the Nutri-Score on products usually known as sport nutrition products. The underlying nutrient profiling system of the Nutri-Score was developed in regard to the needs of the general population, whereas sport nutrition must meet particular needs" (Q&A Nutri-Score III. Food covered)

[2] For instance, on hyponatremia : https://www.trainingpeaks.com/blog/the-dangers-of-hyponatremia/.

[3] Please see Annex 1

[4] It is considered that the contribution of glycogen linked to a balanced and adapted diet can provide energy for 1 to 1.5 hours of effort at a sub-high intensity. After this time, the stock is severely depleted, it is necessary to provide an exogenous, external energy supply such as an energy drink, bar or gel

WHY? People need to have adapted information and accompaniment when buying products

More and more people are challenging themselves in high intensity competitions or training. For example, the practice of cross-fit is accelerating remarkably. In addition, more and more people are running half-marathons or marathons. All these sportsmen or sports women are not professionals; they are not accompanied by a nutritionist doctor or a dietician and they could be vulnerable during intense effort. Thus, they need to have a clear information about:

1/ What they need to consume during intense exercise : Some nutrients are good during intense sport and should be restricted in a daily diet. The front-of-pack aims to shed light on the nutritional quality of a product consumed as part of a varied diet but could cause some confusion in consumer's minds if it is applied on products especially formulated for sport. To affix the front-of-pack on products on those products could prevent consumers from buying a product they physiologically need[5].

2/ Why they need to consume more sugar or salt during exercise : Some health claims have been validated to be used on products intended for sportspeople. These claims are linked to : Carbohydrates solutions & carbohydrates, Creatine, Vitamin C, Protein[6]. These claims sometimes imply a formulation of the products with high levels of sugar and salt. If nutrient profiles are adopted, some of these claims may no longer be allowed even though they require a particular composition high in sugar and salt. However, they are essential for users of sports products as they allow them to know the expected beneficial effect.

Which products should be exempted from FoP and nutritional profiles?

An exemption should be granted for all the products which:
1/ are considered as **essential for sportspeople** in the sense established by the EFSA's report[7] on food intended for sportspeople **AND**
1/ **fill the scientific conditions** established in the EFSA report (SCF 2001 reviewed in 2015) **AND**
2/ **are marketed as products for intensive sport practice** only (mention on the packaging concerning the specific users or health claim related to sport).

These conditions should prevent any abuse of the exemption granted in order to protect the final consumer.

[5] Please see on Annex 2 some chosen passages about a study conducted on the Nutri-Score and its relevance to sports nutrition.
[6] Please see Annex 3
[7] https://www.efsa.europa.eu/en/supporting/pub/en-871

We fully support the introduction of nutritional profiles and a nutritional score on the front of packaging for general food products

We have a preference for the Nutri-Score which has proven to be very effective in terms of consumer purchasing behaviour. We are fully prepared to put it on all our products that are not intended for intense sport practice. We want it to be :

> **Harmonized** in order to enable free movements of goods into EU
> **Mandatory** in order to guarantee the equity between all the food sector operators
> **Supported by science** in order to achieve the original goal of reducing overweight and related diseases. In that sense, exemptions should only be granted when justified on scientific grounds and not because of any national food heritage.
> **Explained** to consumers through broad public media campaigns in order so that the consumer knows how to use this **tool** optimally and so that there is no confusion with other existing or future scores.

Who are we?

Weight problems and obesity are increasing at a rapid rate in most of the EU Member States, with estimates of 51.6 % of the EU's population (18 and over) overweight in 2014. Obesity is a serious public health problem, as it significantly increases the risk of chronic diseases such as cardiovascular disease, type-2 diabetes and certain cancers[8]. The Farm-to-Fork strategy aims to ensure food security, nutrition and public health, making sure that everyone has access to sufficient, safe, nutritious, sustainable food. **To fight against these major problems, solutions exist. It is no longer a matter of proof: health is achieved, among other things, through diet and physical activity**.

Since 1976, Decathlon's mission is to sustainably make the pleasure and benefit of sport accessible to the many. In this regard, our core food products have always been adapted to intensive sports practice (isotonic drinks, proteins, carbohydrates, food supplements). Since 2021, Decathlon Nutrition also wishes to propose accessible general food products adapted to every need which will promote good health for everyone.

Aware that the food transition is **one of the major challenges to be taken up by the World** over the next few years, Decathlon Nutrition signed the Code of Conduct for responsible business and marketing practices and really wishes to get involved in designing, producing and distributing sustainable and nutritious food products.

[8] https://ec.europa.eu/eurostat/statistics-explained/index.php/ Overweight_and_obesity_-_BMI_statistics)

ANNEX 1 - Specific Needs during intense sport practice

Sportspeople are not a category of population as such. They belong to the general population most of the time and need to have a balanced diet, as everyone. But, during the effort, it is proven by science that some specific needs have to be covered through specific products easily consumed during effort. In this regard, the EFSA's report previously mentioned highlights :

a) the essential role of carbohydrate intake in relation to physical performance, and particularly in relation to the recovery of normal muscle function after strenuous exercise, and the role of vitamin B1 on carbohydrate metabolism;
b) the role of hydration and carbohydrate supply in the maintenance of physical performance during endurance exercise, as well as **on the role of electrolytes** (particularly sodium) in the maintenance of adequate hydration during exercise and in post-exercise re-hydration;
c) the essential role of protein in the growth and maintenance of muscle mass, and the role of **vitamin B6** in protein metabolism;
d) the essential role of micronutrients and long-chain polyunsaturated fatty acids on body functions which may impact either athletic performance or specific health risks for athletes;
e) the ergogenic properties of caffeine in endurance exercise; and
f) the ergogenic effects of creatine in physical performance during short-term, high-intensity, repeated exercise bouts.

Annex 2: Consumer's study about Nutri-Score and Sport Nutrition

Study in French in attachment.

Annex 3: Authorized claims concerning sport nutrition

> **Carbohydrate-electrolyte solutions** contribute to the maintenance of endurance performance during prolonged endurance exercise
> **Carbohydrate-electrolyte solutions** enhance the absorption of water during physical exercise
> **Carbohydrates** contribute to the recovery of normal muscle function (contraction) after highly intensive and/or long-lasting physical exercise leading to muscle fatigue and the depletion of glycogen stores in skeletal muscle
> **Vitamin C** contributes to maintain the normal function of the immune system during and after intense physical exercise
> **Creatine** increases physical performance in successive bursts of short-term, high intensity exercise
> **Protein** contributes to a growth in muscle mass / to the maintenance of muscle mass