Document 3.2

EU Fish Processors and Traders Association

AIPCE-CEP

Brussels, 4 January 2023

Subject: Impact of Nutri-Score Labelling algorithm update (June 2022) and upcoming EC FOPNL Proposal on EU Fish Products

The European Association of Fish Processors and European Federation of National Organisations of Fish Importers and Exporters (AIPCE-CEP) established in 1959 represents 19 EU National Associations from 12 Member States and 3 National Associations in Third countries (UK, Norway, Morocco), accounts for more than 3,900 enterprises and 128,000 persons (more than 80% representativeness at EU level).

AIPCE-CEP supports and actively contributes to the European Commission's (EC) initiative on harmonised mandatory front-of-pack nutrition labelling (FOPNL) to enable consumers to make informed and health-conscious food choices. AIPCE-CEP would like to address concerns regarding the impact of the Nutri-Score update report (the Nutri-score algorithm from the Scientific Committee of the Nutri-Score June 2022, hereafter 'the report') and the upcoming EC proposal on the FOPNL on the EU fish products market.

Nutri-Score algorithm update proposal

With the increase in relevance of this subject, it is crucial to provide the best possibilities for consumers to assist them in transitioning to sustainable and healthy diets. AIPCE-CEP believes the proposal on the updated Nutri-Score algorithm calculation methods for fish products under Nutri-Score does not consider the relevant nutrient profile of fish and fish-based products in the update. Against this background AIPCE-CEP would like to highlight the following concerns:

- **Algorithm update:** The report addresses an update to the algorithm on the categories of general foods (main algorithm), fats, oils and nuts and seeds and specific rules for meat products. Furthermore, the report explores and addresses the rationale for the various nutritional criteria that can be considered in the updated algorithm. To this end, the report highlights the nutritive properties of fish products (e.g., essential fatty acids) and the need for adapting the algorithm to accommodate them.

  However, the algorithm update recommendation excludes the specific beneficial nutrients in fish products to be considered for favourable scoring. Overarchingly, the recommendation provides a single change in the grading system for the range 'A-B' threshold. This range generally includes fatty fish products that were at 8% (current situation in Nutri-Score) and are now at 24% in the A category. Although this does pave a wider range for fatty fish products (without added nutrients) to be included in the higher range of Nutri-score, no other sections were updated. Furthermore, the increase in threshold was based on the protein content in fish. Other important nutrient factors were not considered for favourable scoring. Neither can the positive score provided by proteins be applied to those products where the unfavourable elements exceed 11 points.

  The algorithm also recommends further negative scoring of products that contain salt. Smoked and salted fish products on the market, based on the new recommendation conclude with a further negative score

Avenue de Tervueren, 188A, 4th Floor, Postbox 4, 1150 Brussels, Belgium – Office phone number +32 (0)[redacted] – e-mail address: [redacted]@kellencompany.com – website: www.aipce-cep.org

than the currently applied algorithm. Even with the updated scoring system for the range 'A-B' threshold, the favourable scores do not assist products with added nutrients (e.g. salt) to have a better Nutri-Score. The updated proposed scoring also does not allow for product development as safety and organoleptic properties could be compromised.

- **Nutritious properties of fish products:** Fish consumption remains to be an integral and cultural part of the diet in the European Union. EFSA in its recent advice on nutritional profiles for FOPNL[1] concludes that fish products are included in food groups with important and specific dietary roles in European diets. Furthermore, the advice highlights that fish is a significant contributor of essential fatty acids, iodine and vitamin D intake. Dietary sources of vitamin D are mostly fatty fish amongst a few other food products. Sources of EPA (eicosapentaenoic acid) and DHA (docosahexaenoic acid) are almost exclusively foods of marine origin, mainly oily fish and derived products. It is also included as a reliable source of protein. To this end, fish consumption decreases the risk of Cardiovascular Diseases (CVD). EFSA recommends amongst other products the increase in the consumption of fish products. The Panel considers that intake of Omega-3 Fatty Acids such as EPA and DHA may be below the 'Adequate intake' and may be inadequate for primary CVD risk reduction in European countries with low fish consumption.

It is important to consider all the nutritional properties of fish products to accumulate favourable points in the Nutri-Score algorithm to provide a reliable score encouraging the consumption of fish to fulfil necessary nutritional intake requirements and reduce the risk of CVD.

- **Application of salt in fish products:** In 2019, EFSA established a safe and adequate intake of sodium of 2.0 g/day for adults and children from 11 years of age based on the relationship between sodium intake, blood pressure and risk of CVDs[2]. However, the relationship between fish products and salt as well as the type of salt used (e.g. Sea salt) in processing should be considered. Salt primarily provides safety and organoleptic properties for the products. These form an essential aspect to provide safe, healthy and tasty products to consumers. Salt in its adequate intake forms an essential part of the functioning of the human body. Furthermore, the updated proposed scoring, which further gives negative points for salt, does not allow for product development as safety and organoleptic properties could be compromised.

The safety application, acceptable daily intake, portion size and organoleptic factors should be considered on fish products with added nutrients (e.g., salt.).

- **Market Advisory Council (MAC) advice on "Nutri-Score Labelling on Fish Products":** The MAC advice on "Nutri-Score Labelling on Fish Products" highlights key elements as well as discrepancies in the Nutri-Score scoring systems. Furthermore, MAC recommendations for scoring fish products include essential nutrients

[1] EFSA Panel on Nutrition, Novel Foods and Food Allergens (NDA), Turck, D., Bohn, T., Castenmiller, J., de Henauw, S., Hirsch-Ernst, K.I., Knutsen, H.K., Maciuk, A., Mangelsdorf, I., McArdle, H.J. and Naska, A., 2022. Scientific advice related to nutrient profiling for the development of harmonised mandatory front-of-pack nutrition labelling and the setting of nutrient profiles for restricting nutrition and health claims on foods. EFSA Journal, 20(4), p.e07259.

[2] EFSA Panel on Nutrition, Novel Foods and Food Allergens (NDA), Turck, D., Castenmiller, J., de Henauw, S., Hirsch-Ernst, K.I., Kearney, J., Knutsen, H.K., Maciuk, A., Mangelsdorf, I., McArdle, H.J. and Pelaez, C., 2019. Dietary reference values for sodium. *EFSA Journal*, *17*(9), p.e05778.

that fish products provide. The MAC believes that it is important that Front of Pack (FOP) nutrition schemes recommended by European public authorities clearly represent the nutritional values of products, considering the different nutritional aspects.

AIPCE-CEP recommends taking reference to the Market Advisory Council (MAC) advice on "Nutri-Score Labelling on Fish Products"

Upcoming European Commission FOPNL Proposal

AIPCE-CEP supports the European Commission's (EC) initiative on front-of-pack nutrition labelling and anticipates its proposal in this regard. However, in light of Nutri-Score algorithm calculations that discourage consumers towards fish products, AIPCE -CEP would like to highlight the following elements and concerns for your consideration in regard to the upcoming proposal:

- Fish products form an essential part of the nutritional and traditional diet of European consumers. It is important the FOPNL encourage consumers to eat healthier products in order to fulfil the nutritional intake requirements, in harmony with the indications of the EFSA
- FOPNL proposal should include unbiased positive scoring systems on nutrients. Furthermore for non-favourable nutrients (e.g. salt) factors on its application in the product should be considered (e.g. safety).
- Consumption patterns and/or portions of foods should be considered in regard to FOPNL scheme developments.
- FOPNL proposal outcomes should be well-balanced amongst authorized products on the market and the diversity of the market should be considered.
- Consumer education remains a key factor in order to achieve healthy and sustainable diets.