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Farmhouse and
Artisan
Cheese & Dairy Producers
European Network

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Paris, 23 June 2021

*Object: front of pack nutrition labelling*

Dear [redacted],

FACEnetwork - "Farmhouse and Artisan Cheese and dairy producers' European network" - is an association which aims to represent and defend the interests of small scale dairies on European level. We **participate to some ad-hoc meetings of DG SANTE Advisory Group as Observer**. We attended meetings about front of pack nutrition labelling in 2018 and 2019.

The idea to make front of pack nutrition labelling mandatory is emerging in Europe in the framework of the "Farm to Fork strategy". The Nutriscore system (or a similar option) seems to be preferred. However, Nutriscore will result in bad values for farmhouse and artisanal cheeses and dairy products, because these products are made out of whole milk. The fact that they are barely processed, obtained by traditional methods and without additives will not be taken into account.

To date, Regulation (EU) Nr. 1169/2011 provides a derogation to nutritional labelling for "*small quantities of products [sold] to the final consumer or to local retail establishments directly supplying the final consumer*". We are still struggling to obtain a uniform implementation of this derogation in all countries (it is not the case today) and also, for an extension of the cases concerned by the derogation: small dairy producers also may sell all or part of their products not only directly or locally, but also in longer circuits (affineurs, wholesalers or other distribution platforms).

In this context, a legislative proposal for a mandatory front of pack nutrition labelling will be a further burden for our producers, although consumers very often do not base their purchasing decision of farmhouse and artisan dairy products according to their nutrition declaration, but on the conviction of buying unique and different food.

During a recent plenary meeting of DG SANTE Advisory Group (on 07.05.2021), we heard that the Commission may set **a derogation to front of pack nutrition labelling for PDO, IGP and "traditional products". We support this approach, and ask the farmhouse and artisan cheese and dairy products to be considered traditional products.**

We thank you very much in advance for taking into account our position and for keeping us involved in the building process of front of pack nutrition labelling regulation.

Looking forward for your answer.

Best regards,
[redacted], [redacted] FACEnetwork

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Copy to: [redacted] SANTE DDG2 [redacted]