



NUTRITION



GLOBAL HARMONIZATION INITIATIVE
NUTRITION WORKING GROUP
Muthgasse 18
Vienna, Austria
www.globalharmonization.net

20 May 2021

Dear Colleagues from the European Commission at the Directorate General SANTE,
Unit E1 Food information and composition,

Subject: Global Harmonization Initiative Nutrition Working Group opinion on the development of harmonized mandatory front-of-pack nutrition labelling and the setting of nutrient profiles for restricting nutrition and health claims on foods

The Global Harmonization Initiative (GHI) is an international non-profit organization, a network of individual scientists working together to promote the harmonization of global food safety regulations and legislation. The organization engages and empowers food scientists in industry, government and academia to voice scientific consensus and make recommendations on food safety laws and regulations, globally. GHI is an academic stakeholder of EFSA. *Members of GHI, however, never represent their employers. Membership is individual and contributions to GHI are based on the scientific conscience of the members.*

The Global Harmonization Initiative has a working group on food nutrition (GHIWGN) and could be considered as an impartial stakeholder regarding the food legislation harmonization process, at the EU and international level. The WGN, one of the organization's 16 working groups would like to provide their expert view regarding nutrition labelling and nutrient profiles and health claims on foods.

Addressing the EFSA Mandate M-2021-0007 (EFSA-Q-2021-00026) "Request to the European Food Safety Authority for scientific advice on the development of harmonized mandatory front-of-pack nutrition labelling and the setting of nutrient profiles for restricting nutrition and health claims on foods", the GHIWGN is of the opinion that:

Nutrition labelling needs to serve the final consumer in daily food selection towards healthier food choices for its particular age, gender, health status, preferences, eating habits etc.

Also, the front-of-pack labelling needs to boost the fair global food industry and trade system development in direction of the better nutritional food compositions and tailored food formulation for special nutritional needs.

The GHIWGN recommends that the issues to be preliminarily considered in implementing the EU harmonized front-of-pack nutrition labelling should include the following:

I. **The FOP harmonised mandatory food information**, as following:

- Food identity: descriptive name, country of origin (pictorial logo or descriptive), business producer name (pictorial logo or descriptive), a fair pictorial food image, the net quantity, number of portions per package (pictorial logo or descriptive);
- Food composition: List of up to three ingredients, inclusive of the primary ingredient
- Food nutrient nature (vegetable, animal, substitute/imitation/formed/cultured: chemical, GMO/non GMO, lab-cultured from stem cells);
- Mandatory nutrition declarations: Energy value, amount of energy % from Dietary Reference Values (DRV);
- Nutrition and health claims: up to three nutrition and health logos;
- Safe condition of food use: allergens or intolerance-inducing ingredients, date of minimum durability, pictorial of use instructions.

II. **The FOP harmonised additional form of expression and presentation should accomplish the seven requirements established in Article 35 from Chapter IV of the EU Regulation No. 1169/2011, as followings:**

“a) they are based on sound and scientifically valid consumer research and do not mislead the consumer as referred to in Article 7;

(b) their development is the result of consultation with a wide range of stakeholder groups;

(c) they aim to facilitate consumer understanding of the contribution or importance of the food to the energy and nutrient content of a diet;

(d) they are supported by scientifically valid evidence of understanding of such forms of expression or presentation by the average consumer;

(e) in the case of other forms of expression, they are based either on the harmonised reference intakes set out in Annex XIII, or in their absence, on generally accepted scientific advice on intakes for energy or nutrients;

(f) they are objective and non-discriminatory; and

(g) their application does not create obstacles to the free movement of goods.”

The opinion of the GHIWGN is that all seven requirements need to be met for any harmonized mandatory front-of-pack nutrition labelling system.

- III. The concept of FOP nutrition labelling is needed to be integrated and harmonised in the existing EU Regulation No. 1169/2011 regarding the “field of vision” or “principal field of vision”.

- IV. All the information provided on the food label should support the consumer in correct food choosing by using a **fair, accurate, clear, easy-to-read and understand food label**, including **mandatory, voluntary and additional form of expression on the front of package** and a **harmonized format of descriptive, pictorial and tabular format information** (mandatory number and information type, proportional size, colour, position on the label, etc.) regarding the foods nutritional value scoring/grading, identity & authenticity food pictorial or logos, nutrition & health claims logos, origin, number of servings logos, conditions of standard preparation, packaging recycling information, etc.

Also, please consider our **Global Harmonization Initiative (GHI) Nutrition Working Group** input in move forward the issue of harmonization the global nutrition legislation by consulting the following contributions:

[Vintila I., V.Y. Waisundara, H.L.M. Lelieveld](https://doi.org/10.3920/QAS2018.1388), 2019 Current legislations in nutrition and issues requiring global harmonisation, *Quality Assurance and Safety of Crops & Foods*, 1 - 10
<https://doi.org/10.3920/QAS2018.1388>

Vintilă, I., 2019, Global issues in harmonization of nutrition legislation, *1st GHI World Congress on Food Safety and Security*, 24-28 March, Leiden, Netherlands. <https://ghiworldcongress.org/>

Vintilă, I., 2019, New Paradigm in Global Harmonization Initiative of Nutrition Legislation, *1st GHI World Congress on Food Safety and Security*, 24-28 March, Leiden, Netherlands. <https://ghiworldcongress.org/>

With our best regards,

Chairs of the Global Harmonization Initiative Working Group Nutrition:

[Redacted] ([Redacted] @ugal.ro) [Redacted]
[Redacted] ([Redacted] @gmail.com)
[Redacted] ([Redacted] @gmail.com)

Cc:

[Redacted] ([Redacted] @globalharmonization.net)
[Redacted] ([Redacted] @graduate.curtin.edu.au)