

# **Nutri-Score and Soft Drinks:** *Meeting with DG SANTE to present UNESDA/Link-Up report*

17 March 2021

# UNESDA's position on Front of Pack Nutrition Labelling

**UNESDA supports EU harmonization for front of pack labelling to empower consumers to make informed choices and to ensure smooth functioning of the Single Market**

- EU harmonized with an EU governance model for implementation
- Incentivizes producers to reformulate and offer more choices: Specifically for beverages, to help consumers of soft drinks to choose lower sugar options
- Helps people make informed choices with clear and transparent information
- Built on sound and scientific evidence
- Does not discriminate foods or ingredients
- Is aligned with EU legislation (such as Food Information to Consumers Regulation and EU Nutrition and Health Claims Regulation)
- Reflects dietary needs of the entire EU population

# Overview of LinkUp and UNESDA

## LinkUp:

- French agency specialized in providing advice in relation to Corporate Social Responsibility, behaviour changes and nutrition
- Long experience of developing public health programmes, such as 'Vivons en Forme' in France
- In 2016, LinkUp commissioned by the French Health Ministry to analyse the performance in 'real life' situations of various nutrition labelling schemes in France, including Nutri-Score
  - Led to Nutri-Score being selected in 2017 as the French voluntary front-of-pack nutrition labelling scheme
- LinkUp has also developed public health campaigns such as on preventing childhood obesity and encouraging handwashing in schools

## UNESDA:

- European association representing all non-alcoholic beverages apart from juices & natural mineral water
- UNESDA membership comprises 23 national soft drink associations and 9 companies (*see next slide for the full list*)

For any questions regarding the report, please feel free to contact UNESDA: [nhodac@unesda.eu](mailto:nhodac@unesda.eu) and/or [hbenson@unesda.eu](mailto:hbenson@unesda.eu) – [www.unesda.eu](http://www.unesda.eu)

# UNESDA membership

## 23 national associations

 Austria	 Luxembourg
 Belgium	 Norway
 Bulgaria	 Portugal
 Czech Republic	 Romania
 Denmark	 Slovakia
 Estonia	 Slovenia
 Finland	 Spain
 France	 Sweden
 Germany	 Switzerland
 Greece	 The Netherlands
 Ireland	 United Kingdom
 Italy	

## 9 companies



*The Coca-Cola Company*

# Nutri-Score report: *Overview*

## Part 1: Scientific review co-authored by LinkUp and UNESDA

- Identifies key success factors for front-of-pack nutrition labelling (FOPNL) to meet the dual public health objectives, as defined by Prof Hercberg in 2014:
  - Optimizing consumer information about overall nutritional content of food
  - Encouraging food producers to improve nutritional content

## Part 2: Analysis of the performance of Nutri-Score on soft drinks

- Three 'Nutri-Score countries' selected: Belgium, France, Spain in which the impact of Nutri-Score was analyzed on top-selling beverages representing at least a total 75% market share
- The current Nutri-Score scheme was compared to three slightly different alternative options provided by UNESDA for optimizing the current algorithm:
  - Approach #1: Alignment with the sugar thresholds set out by the EU Nutrition and Health Claims Regulation for relevant nutrition claims
  - Approaches #2 and #3: No change to the sugar thresholds of the Nutri-Score algorithm but slight evolutions to the points allocated for each ranking



# Nutri-Score report: Underpinned by scientific references

## References

Andriukaitis. (2019). Answer given by Mr Andriukaitis on behalf of the European Commission. Retrieved from: [https://www.europarl.europa.eu/doceo/document/P-9-2019-030306\\_ASW\\_EN.pdf](https://www.europarl.europa.eu/doceo/document/P-9-2019-030306_ASW_EN.pdf)

BEUC - The European Consumers' Organisation. (2005). Report on European Consumers' Perception of Foodstuffs Labelling Results of Consumer Research conducted on behalf of BEUC from February to April 2005. Retrieved from BEUC: [https://www.vzbv.de/sites/default/files/mediapics/beuc\\_foodstuffs\\_labelling\\_09\\_20\\_05.pdf](https://www.vzbv.de/sites/default/files/mediapics/beuc_foodstuffs_labelling_09_20_05.pdf)

BEUC - The European Consumers' Organisation. (2006). European Commissions paper on labelling Comments on the Consultative document on Labelling. Retrieved from: [https://ec.europa.eu/food/sites/food/files/safety/docs/labelling-nutrition\\_better-reg\\_indiv-resp\\_93.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/labelling-nutrition_better-reg_indiv-resp_93.pdf)

Chauliac, M. (2018). NUTRI SCORE THE FRONT OF PACK NUTRITION LABELLING SCHEME RECOMMENDED IN FRANCE. Retrieved from: [https://ec.europa.eu/food/sites/food/files/animals/docs/comm\\_ahac\\_20180423\\_pr\\_es4.pdf](https://ec.europa.eu/food/sites/food/files/animals/docs/comm_ahac_20180423_pr_es4.pdf)

Department of Health. (2011). Nutrient Profiling Technical Guidance. Retrieved from: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/216094/dh\\_123492.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/216094/dh_123492.pdf)

DG SANCO - Directorate-General for Health and Consumer Protection. (2006). Labelling: competitiveness, consumer information and better regulation for the EU. Retrieved from: [https://ec.europa.eu/food/sites/food/files/safety/docs/labelling-nutrition\\_better-reg\\_competitiveness-consumer-info\\_en.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/labelling-nutrition_better-reg_competitiveness-consumer-info_en.pdf)

Dréano-Tréant, L., Egnell, M., Herceberg, S., Galan, P., Soudon, J., Fialon, M., ... Julia, C. (2020). Performance of the Front-of-Pack Nutrition Label Nutri-Score to Discriminate the Nutritional Quality of Foods Products: A Comparative Study across 8 European Countries. Retrieved from US National Library of Medicine - National Institutes of Health: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7284849/>

Dubois, P., Albuquerque, P., Allais, O., Bonnet, C., Bertrall, P., Combris, P., ... Chandon, P. (2020). Effects of front-of-pack labels on the nutritional quality of supermarket food purchases: evidence from a large-scale randomized controlled trial. Retrieved from Journal of the Academy of Marketing Science: <https://link.springer.com/article/10.1007/s11747-020-00723-5>

Dutch EU presidency team. (2016). Roadmap for Action on Food Product Improvement. Retrieved from [https://ec.europa.eu/health/sites/health/files/nutrition\\_physical\\_activity/docs/2016\\_eunipresidency\\_roadmap\\_en.pdf](https://ec.europa.eu/health/sites/health/files/nutrition_physical_activity/docs/2016_eunipresidency_roadmap_en.pdf)

European Commission. (2020). Farm to Fork Strategy For a fair, healthy and environmentally-friendly food system. Retrieved from European Commission: [https://ec.europa.eu/food/sites/food/files/safety/docs/f2f\\_action-plan\\_2020\\_strategy-info\\_en.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/f2f_action-plan_2020_strategy-info_en.pdf)

European Commission. (2020). REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL regarding the use of additional forms of expression and presentation of the nutrition declaration. Retrieved from European Commission: [https://ec.europa.eu/food/sites/food/files/safety/docs/labelling-nutrition\\_top-report\\_2020-207\\_en.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/labelling-nutrition_top-report_2020-207_en.pdf)

European Parliament, Council of the European Union. (2006). REGULATION (EC) No 1924/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL. Retrieved from Official Journal of the European Union: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32006R1924&from=FR>

European Parliament, Council of the European Union. (2011). REGULATION (EU) No 1169/2011 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council. Retrieved from Official Journal of the European Union: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32011R1169&from=FR>

FAO. (1993). CODEX GUIDELINES ON NUTRITION LABELLING. Retrieved from FAO: <https://www.fao.org/2/22720e/22720e06.htm>

Haut Conseil de la Santé Publique. (2015). Information sur la qualité nutritionnelle des produits alimentaires. Retrieved from Avis et rapports: <https://www.hcsp.fr/explorer.cgi?avisrapportsdomaine?defr=519&contexte=officelles/rapports/sante/article/propositions-pour-un-nouvel-etan-de-la-politique-nutritionnelle-de-sante>

Herceberg. (2014). Propositions pour un nouvel élan de la politique nutritionnelle de santé publique. Retrieved from Ministère des solidarités et de la santé: <https://solidarites-sante.gouv.fr/ministere/documentation-et-publications-officelles/rapports/sante/article/propositions-pour-un-nouvel-etan-de-la-politique-nutritionnelle-de-sante>

Ikonen, L., Sotgiu, F., Aydinli, A., & Verlegh, P. (2019). Consumer effects of front-of-pack nutrition reformulation: an interdisciplinary meta-analysis. Retrieved from Journal of the Academy of Marketing Science: <https://link.springer.com/article/10.1007/s11747-019-0262-9>

Julia, C., Kesse-Guyot, E., Ducrot, P., Péneau, S., Touvier, M., Méjean, C., & Herceberg, S. (2015). Performance of a five category front-of-pack labelling system – the 5-colour nutrition label – to differentiate nutritional quality of breakfast cereals in France. Retrieved from BMC Public Health: <https://bmcpublichealth.biomedcentral.com/track/pdf/10.1186/s12889-015-1522-y>

Julia, C., Kesse-Guyot, E., Touvier, M., Méjean, C., Fezeu, L., & Herceberg, S. (2014). Application of the British Food Standards Agency nutrient profiling system in a French food composition database. Retrieved from British Journal of Nutrition: [https://www.cambridge.org/core/services/aop-cambridge-core/content/view/2C2AB1CDE160D7A0E600E2581A76C4F/50007114514002761a.pdf/application\\_of\\_the\\_british\\_food\\_standards\\_agency\\_nutrient\\_profiling\\_system\\_in\\_a\\_french\\_food\\_composition\\_database.pdf](https://www.cambridge.org/core/services/aop-cambridge-core/content/view/2C2AB1CDE160D7A0E600E2581A76C4F/50007114514002761a.pdf/application_of_the_british_food_standards_agency_nutrient_profiling_system_in_a_french_food_composition_database.pdf)

Kantar panel. (2018). WHAT ARE YOUR CONSUMERS' EXPECTATIONS IN FRANCE AND AROUND THE WORLD? Retrieved from SIAL: [https://www.sial-network.com/Food-Trends/Food-trends-analysis-CONSUMERS-DEMANDS?utm\\_source=Social2Media](https://www.sial-network.com/Food-Trends/Food-trends-analysis-CONSUMERS-DEMANDS?utm_source=Social2Media)

Kassarjian, H., & Cohen, J. (1965). Cognitive Dissonance and Consumer Behavior. Retrieved from Sage Journals: <https://journals.sagepub.com/doi/10.2307/4116560>

Ministre des solidarités et de la santé, M. d. (2019). Arrêté du 30 août 2019 modifiant l'arrêté du 31 octobre 2017 fixant la forme de présentation complémentaire à la déclaration nutritionnelle recommandée par l'Etat en application des articles L. 3232-8 et R. 3232-7 du code de la santé publique. Retrieved from Légifrance: <https://www.legifrance.gouv.fr/jfpr/id/JQRBTXT000039034274/>

Ni Mhurchu, C., Eyles, H., & Choi, Y.-H. (2017). Effects of a Voluntary Front-of-Pack Nutrition Labelling System on Packaged Food Reformulation: The Health Star Rating System in New Zealand. Retrieved from MDPI: <https://www.mdpi.com/2072-6643/9/8/918>

Storcksdieck genannt Bonsmann, S., Marandola, G., Ciriolo, E., van Bavel, R., & Wollgast, J. (2020). Front-of-pack nutrition labelling schemes: a comprehensive review Retrieved from: [https://publications.jrc.ec.europa.eu/repository/bitstream/JRC113586/kjna29811en\\_n\\_1.pdf](https://publications.jrc.ec.europa.eu/repository/bitstream/JRC113586/kjna29811en_n_1.pdf)

Talati, Z., Pettigrew, S., Neal, B., Dixon, H., Hughes, C., Kelly, B., & Miller, C. (2017). Consumers' responses to health claims in the context of other on-pack nutrition information: a systematic review Retrieved from Nutrition Reviews: <https://academic.oup.com/nutritionreviews/article/75/4/260/3076821>

UNESDA. (2020). EU FARM TO FORK STRATEGY: UNESDA PRELIMINARY CONTRIBUTION Making the healthier choice the easy choice. Retrieved from UNESDA: <https://www.unesda.eu/wp-content/uploads/2020/09/UNESDA-F2F-Plan-10.pdf>

UNESDA. (2020). Sugar reduction. Retrieved from UNESDA: <https://www.unesda.eu/sugar-reduction/>

van Raaij, J., Hendriksen, M., & Verhaegen, H. (2008). Potential for improvement of population diet through reformulation of commonly eaten foods. Retrieved from Public Health Nutrition: [https://www.cambridge.org/core/services/aop-cambridge-core/content/view/22073BAAF6E29CA2162CE00808C95/5136898008003376a.pdf/potential\\_for\\_improvement\\_of\\_population\\_diet\\_through\\_reformulation\\_of\\_commonly\\_eaten\\_foods.pdf](https://www.cambridge.org/core/services/aop-cambridge-core/content/view/22073BAAF6E29CA2162CE00808C95/5136898008003376a.pdf/potential_for_improvement_of_population_diet_through_reformulation_of_commonly_eaten_foods.pdf)

Vermote, M., Bonnewyn, S., Matthys, C., & Vandevievere, S. (2020). Nutritional Content, Labelling and Marketing of Breakfast Cereals on the Belgian Market and Their Reformulation in Anticipation of the implementation of the Nutri-Score Front-of-Pack Labelling System. Retrieved from MDPI: <https://www.mdpi.com/2072-6643/12/4/884>

Vyth, E., Steenhuis, I., Roodenburg, A., Brug, J., & Seidel, J. (2010). Front-of-pack nutrition label stimulates healthier product development: a quantitative analysis. Retrieved from PubMed: <https://pubmed.ncbi.nlm.nih.gov/20825645/>

World Health Organization. (2019). Guiding principles and framework manual for front-of-pack labelling for promoting healthy diet. Retrieved from World Health Organization: <https://www.who.int/nutrition/publications/policies/guidingprinciples-labelling-promoting-healthydiet.pdf?ua=1>

The report was based on 13 scientific references

# Nutri-Score report: *Key success factors of front-of-pack nutrition labelling to meet public health objectives*

## Objective 1

Clear, easily understandable consumer information

## Objective 2

Offer consumers a balanced distribution within a specific category to accurately reflect nutritional content

## Objective 3

Incentivises food and beverage producers to reformulate to widen consumer choice



**Nutri-Score report: *Nutri-Score system for beverages needs to be optimized to be more helpful in guiding the consumer***

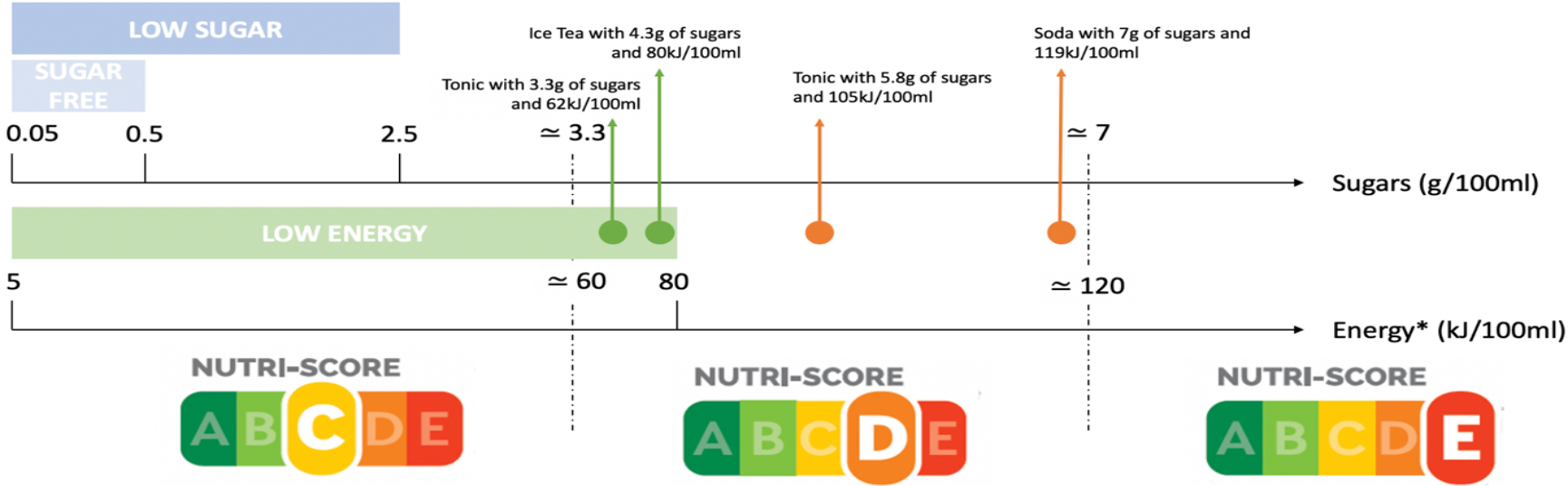
**“The current Nutri-Score system for beverages is not optimized to support the two key objectives for a front of pack nutrition labelling scheme: to incentivize reformulation and to help people make more informed choices.”**





# Nutri-Score report:

## Nutri-Score & nutrition claims – sugar levels not aligned



\*Energy calculation : we consider that energy is only provided by sugars and organic acids (0.3g/100ml)

# Optimizing the Nutri-Score scheme for beverages (1/3)

1. To improve consumer understanding by avoiding conflicting information between Nutri-Score rating and nutrition claims: For example, a product with a “low energy” claim is assigned a ‘D’ ranking according to the current Nutri-Score algorithm, giving consumers conflicting messages on the same product

## Fuze Tea Peach Hibiscus

*Labelled ‘low in calories’*



100ml :  
79kJ / 19kcal  
4.3g sugar

Current Nutri-Score



UNESDA approaches 1, 2 or 3



## May Tea (blackberry/blueberry)

*Labelled ‘low in calories’*



100ml :  
78kJ / 18kcal  
4.3g sugar

Current Nutri-Score



UNESDA approaches 1, 2 or 3



# Optimizing the Nutri-Score scheme for beverages (2/3)

## 2. Widen consumer choice of low- and no-calorie products by enhancing the incentive for soft drink producers to reformulate

### Fanta Orange 'No calories'



100ml :  
11kJ / 3kcal  
0.4g sugar

### Current Nutri-Score



UNESDA approaches 1, 2 or 3



When a soft drink exceeds 0g of sugar, it is immediately given a C ranking, **even for a sugar content as low as 0.1g**. This is not the same approach as applied to foods and does not provide consumers with the appropriate information to choose soft drinks with less sugar. The scheme does not provide producers with an incentive to continue to reformulate or to innovate with new low-sugar soft drinks. The Nutri-Score thresholds should more accurately reflect the nutritional content of soft drinks.

# Optimizing the Nutri-Score scheme for beverages (3/3) :

More effectively guide consumers in their choices by achieving a more even distribution of Nutri-Score ratings for soft drinks



**FAIBLE EN CALORIES**

NUTRITION / VOEDING	100 ml
Énergie/Energie	78 kJ 18 kcal
Matières grasses/Vetten	0 g
dont acides gras saturés/ waarvan verzadigde vetzuren	0 g
Glucides/Koolhydraten	4,4 g
dont sucres/waarvan suikers	4,3 g
Protéines/Eiwitten	0 g
Sel/Zout	0,03 g

Score 6

**Dr Pepper**



DÉCLARATION NUTRITIONNELLE VOEDINGSWAARDEVERMELDING NUTRITION DECLARATION	100 ml
ENERGIE / ENERGY	118 kJ 28 kcal
MATIÈRES GRASSES (DONT ACIDES GRAS SATURÉS) VETTEN (WAARVAN VERZADIGDE VETZUREN) FAT (OF WHICH SATURATES)	0 g (0 g)
GLUCIDES (DONT SUCRES) KOOHYDRATEN (WAARVAN SUIKERS) CARBOHYDRATES (OF WHICH SUGARS)	6,9 g (6,8 g)
PROTÉINES / EIWITTEN / PROTEINS	0 g
SEL / ZOUT / SALT	0,02 g

Score 9

Current Nutri-Score (both products):



UNESDA approaches 1, 2 or 3



**May Tea**  
(blackberry/blueberry)  
Labelled 'low in calories'

Same Nutri-Score rating despite significantly different sugar content - 4.3g/100ml v 6.8g/100ml (+58%).

The consumer may mistakenly consider that the two products with a Nutri-Score D rating have the same nutritional quality.

Soft drinks are constrained mainly to the C, D and E Nutri-Score classes as the A class is only for waters and the B class excludes soft drinks with ANY sugar content over 0g. In France, for example, more than 80% of drinks are ranked in the D or E class, thereby negating the ability of Nutri-Score to identify to the consumer differences between products according to nutritional content.

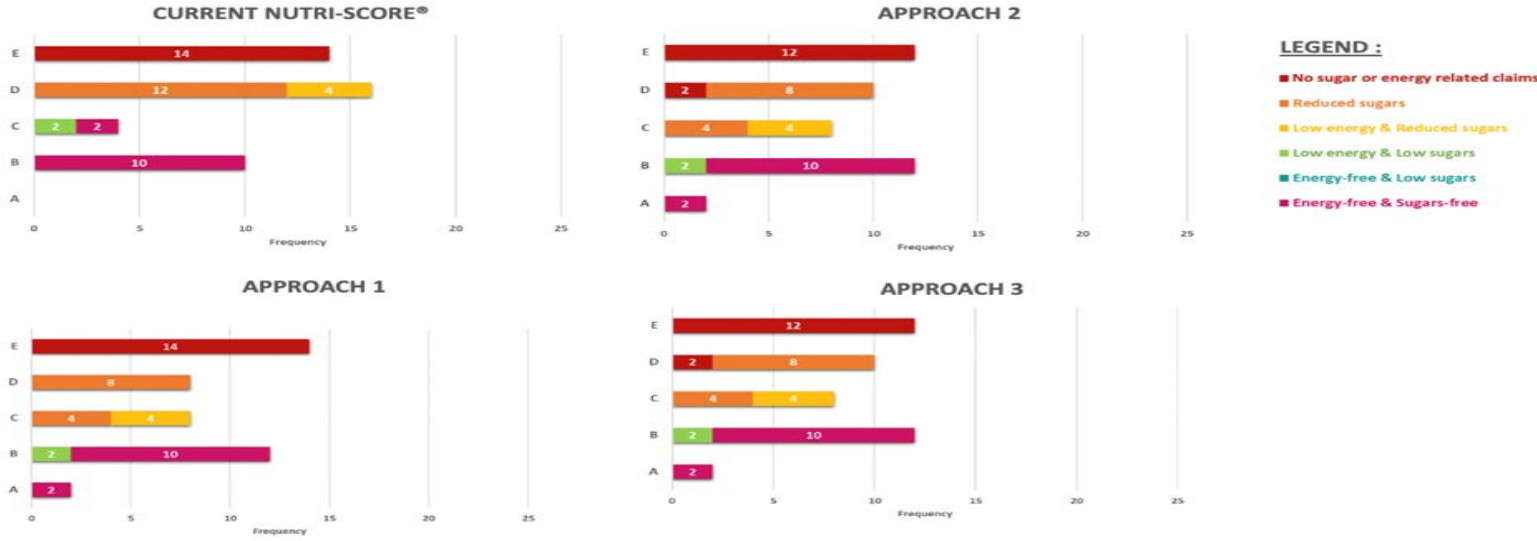
# Nutri-Score report:

## Three alternative approaches proposed by UNESDA for Nutri-Score for beverages

NUTRI-SCORE® RATING	INITIAL NUTRI-SCORE®	SCENARIO 1	SCENARIO 2	SCENARIO 3
<b>A</b>	<b>Waters only</b>	<p><b>Waters</b></p> <p><b>Less than 0.05% sugars</b></p> <p>Waters (natural mineral water, spring water, table water and drinking water), including those for which the only added ingredients are carbon dioxide and/or flavourings (acc. to Annex V number 3, EU Food Information Regulation 1169/2011)</p>	<p><b>Waters</b></p> <p><b>Less than 0.05% sugars</b></p> <p>Waters (natural mineral water, spring water, table water and drinking water), including those for which the only added ingredients are carbon dioxide and/or flavourings (acc. to Annex V number 3, EU Food Information Regulation 1169/2011)</p>	<p><b>Waters</b></p> <p><b>Less than 0.05% sugars</b></p> <p>Waters (natural mineral water, spring water, table water and drinking water), including those for which the only added ingredients are carbon dioxide and/or flavourings (acc. to Annex V number 3, EU Food Information Regulation 1169/2011)</p>
<b>B</b>	<b>Min to 1 point (FSA score)</b>	<p><b>0.05-2.5% sugars</b></p> <p>Beverages qualifying for the following nutrition claims as per the EU Claims Regulation 1924/2006: "sugars free" (max 0.5g sugars/100ml) "energy free" (max 4 kcal (17 kJ)/100ml) "low in sugars" (max 2.5g sugars/100ml)</p>	<p><b>Min to 2 points (FSA score)</b></p> <p>Current Nutri-Score system + 1 pt Content of sugars: 0-1.5%</p>	<p><b>Min to 3 points (FSA score)</b></p> <p>Current Nutri-Score system + 2 pts Content of sugars: 0-1.76%</p>
<b>C</b>	<b>2 to 5 points (FSA score)</b>	<p><b>&gt; 2.5 – 5% sugars</b></p> <p>Beverages qualifying for "low in calories" as per the EU Claims Regulation 1924/2006 - max 20 kcal (80 kJ)/100ml</p>	<p><b>3 to 6 points (FSA score)</b></p> <p>Current Nutri-Score system + 1 pt Content of sugars: 1.55-4.5%</p>	<p><b>4 to 7 points (FSA score)</b></p> <p>Current Nutri-Score system + 2 pts Content of sugars: 1.77-5.29%</p>
<b>D</b>	<b>6 to 9 points (FSA score)</b>	<p><b>&gt; 5 – 7% sugars</b></p> <p>Beverages that may qualify for "reduced sugars" as per the EU Claims Regulation 1924/2006</p>	<p><b>7 to 10 points (FSA score)</b></p> <p>Current Nutri-Score system + 1 pt Content of sugars: 4.55-7.5%</p>	<p><b>8 to 10 points (FSA score)</b></p> <p>Current Nutri-Score system + 1 pt Content of sugars: 5.30-7.5%</p>
<b>E</b>	<b>10 to max points (FSA score)</b>	<p><b>&gt; 7% sugars</b></p> <p>Other beverages</p>	<p><b>11 to max points (FSA score)</b></p> <p>Current Nutri-Score system + 1 pt Content of sugars: ≥7.55%</p>	<p><b>11 to max points (FSA score)</b></p> <p>Current Nutri-Score system + 1 pt Content of sugars: ≥7.55%</p>



# Improving consumer understanding by avoiding conflicting information with claims such as ‘low-calorie’



**Approach 1** achieves a high level of consistency between claims and Nutri-Score. No drinks with claims are ranked E which would be confusing for consumers.

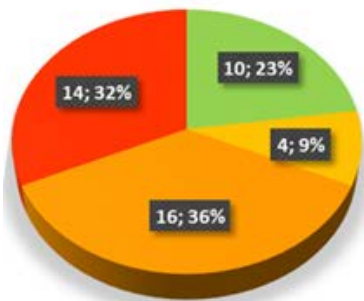
*Examples: The drinks with “low energy” and “reduced sugars” claims are ranked C and not D (current Nutri-Score) and the “low energy” and “low sugars” drinks are ranked B and not C (current Nutri-Score). However, some slight potential confusions for drinks with “reduced sugars” claims which are in 2 different classes - C or D.*

**Approaches 2 and 3** also produce a high level of consistency between claims and Nutri-Score. The only difference with the approach 1 is between the E and D classes

# More effectively guide consumer choice by enhancing distribution of rankings



CURRENT NUTRI-SCORE®



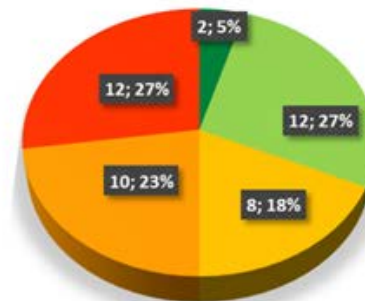
APPROACH 1



APPROACH 2

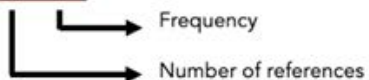


APPROACH 3

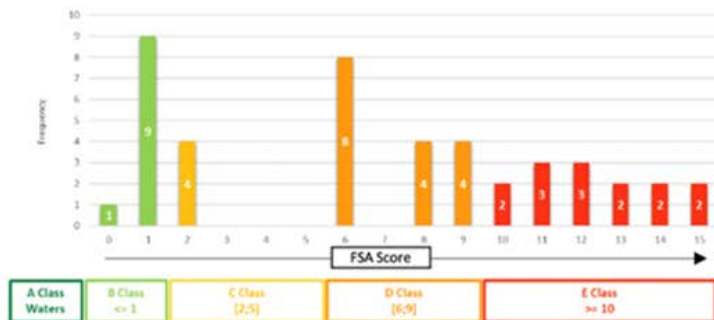


LEGEND : A B C D E

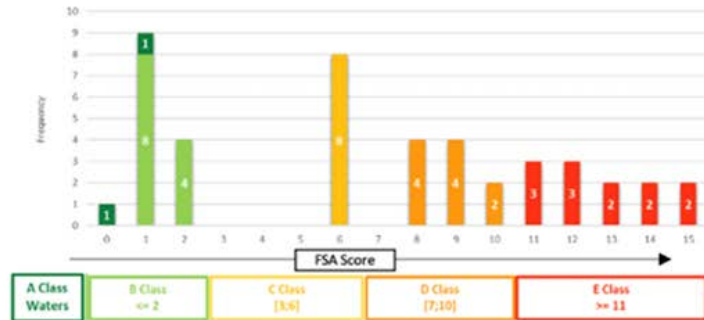
25; 52%



CURRENT NUTRI-SCORE®



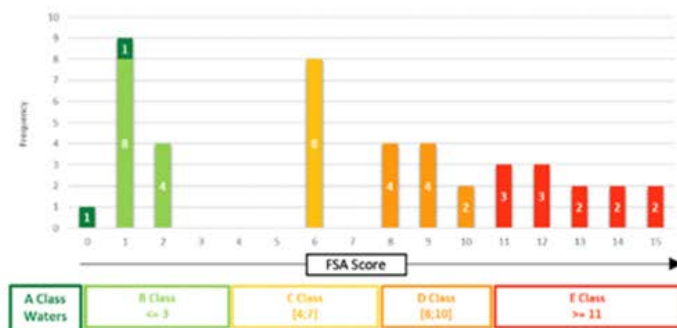
APPROACH 2



APPROACH 1



APPROACH 3





# Conclusion

- The UNESDA-LinkUp report concludes there are benefits to the consumer with a slightly adapted Nutri-Score system for beverages to:
  - ✓ improve consumer understanding by avoiding conflicting information with claims such as ‘low-calorie’ or ‘no sugar’
  - ✓ more effectively guide consumers in their choices by a more even distribution of rankings throughout the soft drink segment, helping consumers identify the lower sugar beverage
  - ✓ incentivize producers to reformulate by reflecting differences in sugar content more clearly to the consumer