



21NUT185
18 June 2021

**To the attention of the Nutriscore Steering Committee
FEDIOL request for adjustments into the Nutriscore for bottled vegetable oils
and fats**

Dear Madam, dear Sir,

FEDIOL is the European federation representing the interests of the European vegetable oil and protein meal industry. As such, FEDIOL covers the vegetable oils and fats including bottled oils and fats and oils and fats used as ingredients but not the foods where vegetable oils and fats are an ingredient. Directly and indirectly, FEDIOL covers about 180 processing sites that crush oilseeds and/or refine crude vegetable oils and fats. These plants belong to around 80 companies. It is estimated that 85% of the EU crushing and refining activities are covered by the FEDIOL membership structure.

For many years, FEDIOL has been following national and EU developments as regards front of pack labelling schemes. With the introduction of the Nutriscore in a number of countries in the recent years, FEDIOL has analysed the way it applies to bottled vegetable oils and fats. In this context, FEDIOL read with attention the creation of the transnational Nutriscore body and the possibility to submit a dossier to request adjustments to the Nutriscore calculations.

Today, bottled vegetable oils and fats are in the categories ranging from C to E. Nearly all of them – whilst having a very different fatty acid profile – are in the categories “C” or “D”, suggesting to eat them “less frequently”. At the same time, national, European and International scientific public bodies¹ are recommending consumption of vegetable oils rich in polyunsaturated fats over other oils and replacement of saturated fat by unsaturated fat. This creates a clear contradiction between the two.

According to the EU Farm to Fork strategy, *it is estimated that in the EU in 2017 over 950,000 deaths (one out of five) and over 16 million lost healthy life years were attributable to unhealthy diets, mainly cardiovascular diseases and cancers*². As high cholesterol is a risk factor in the development of coronary heart disease, any step to maintain normal blood cholesterol levels or to lower blood cholesterol levels is a step towards reduction of cardiovascular diseases. The benefits of unsaturated fats and omega 3 among other on 1) maintenance of normal blood cholesterol levels and on 2) lowering/reduction of blood cholesterol levels are documented by ample scientific evidence recognised in EFSA assessments³. Further to this, dietary guidelines in 23 EU countries, as detailed in Annex 3, recommend replacing animal fat by vegetable oil,

¹ See for details Annex 3.

² Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions : a Farm to Fork strategy for a fair, healthy and environmentally-friendly food system com/2020/381 final

³ See for details in Annex 2.

saturated fat by unsaturated fat and/or increased intake of PUFA or omega-3. Vegetable oils and fats are a major contributor of polyunsaturated fats, which have proven health benefits in a healthy diet, whilst at insufficient intake by several population groups.⁴

Replacing saturated fats by unsaturated fats - and particularly polyunsaturated fats and omega 3 - can therefore play a role in contributing to healthier diet.

To empower consumers in benefiting from a meaningful and informed choice which the Nutriscore pursues, in line with national, EU and international scientific public bodies recommendations, FEDIOL calls for the consideration of "high in unsaturated fat"⁵ and "high in omega 3"⁶ criteria into the Nutriscore algorithm for those bottled vegetable oils and fats meeting such conditions. In practice, this would grant the category "B" to some bottled oils and fats which are already recommended by national, EU and international public bodies. This would be the case of rapeseed oil, camelina oil, linseed oil, soybean oil, walnut oil and mustard oil.

Whilst rapeseed oil, walnut oil and olive oil have been recently recognised under the "positive" criteria of "fruits, vegetables and nuts", other vegetable oils and fats also possess very similar intrinsic properties, which should also equally be recognised. This is the case of vegetable oils like camelina oil, linseed oil, soybean oil or mustard oil. Considering equally such vegetable oils and fats – which are also known and traditional foods in some EU countries – is also the approach advocated by WHO⁷ and in national dietary guidelines⁸ to increase the uptake of healthy diets. FEDIOL hence require inclusion of such vegetable oils "high in omega 3" under the category "fruits, vegetables and nuts". This will also ensure equal treatment for such vegetable oils, when used as ingredients in final food products, hereby enabling the attribution of the same positive points as those already granted when using rapeseed oil, olive oil or walnut oil when reformulating food products.

In addition, to ensure alignment with existing national nutrition recommendations whereby olive oil is also recommended in a healthy diet, FEDIOL proposes an adaptation of the negative saturated fat ratio (adaptation of the threshold for the saturated fat ratio as detailed in Annex 1), covering olive oil only.

These adaptations as detailed in Annex 1 ensure that bottled vegetables oils and fats "high in unsaturated fat" and "high in omega 3" and olive oil would fall into category "B", hereby better highlighting their positive contribution to a healthy diet. Other vegetable oils and fats not meeting such criteria would remain at their current scoring.

⁴ Sioen I, van Lieshout L, Eilander A, Fleith M, Lohner S, Szommer A, Petisca C, Eussen S, Forsyth S, Calder PC, Campoy C, Mensink RP. Systematic Review on N-3 and N-6 Polyunsaturated Fatty Acid Intake in European Countries in Light of the Current Recommendations - Focus on Specific Population Groups. *Ann Nutr Metab.* 2017;70(1):39-50. doi: 10.1159/000456723. Epub 2017 Feb 11.

⁵ See EFSA opinions on health claims

<http://www.efsa.europa.eu/en/efsajournal/doc/2203.pdf>; <http://www.efsa.europa.eu/en/efsajournal/doc/1252.pdf>

⁶ See EFSA opinions on health claims

<https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.2168>; <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.2043>; <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.2203>; <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.2069>

⁷ Safe and healthy food in traditional food markets in the WHO European Region, January 2021. Copenhagen: WHO Regional Office for Europe; 2021. Licence: CC BY-NC-SA 3.0 IGO.

⁸ See Annex 3.

FEDIOL has identified the possible concrete adaptations of the algorithm as detailed in Annex 1, which are concerning only nutrients, which are part of the mandatory food labelling 1) either under the nutrition declaration as per Regulation (EC) No 1169/2011 on food information to consumers or 2) as part of the mandatory labelling required on food products when setting a nutrition and/or health claims as per Regulation (EC) No 1924/2006 as modified by Regulation (EC) No 1169/2011. This is in line with the requirements set under the mandate of the Nutriscore scientific committee published in February 2021.

Besides, FEDIOL would particularly like to highlight that the FEDIOL proposal goes in the same spirit as the adaptations proposed in September 2019 by the Nutriscore itself for rapeseed oil, walnut oil and olive oil, whilst going further. Having developed the set of FEDIOL proposals that are available in annex 1 in further details, FEDIOL recognises that there might be other ways to reach the same conclusions. In practice, current criteria proposed for "added oils and fats" such as energy content and saturated fat do not enable differentiation between bottled vegetable oils and fats and provide almost the same "scoring" for all vegetable oils and fats. For example, the energy criteria does not take into consideration bottled vegetable oils and fats that are "high in unsaturated fat" – whilst they are the main source of intake of essential fatty acids and some fat soluble vitamins in the diet. This contributes to a healthy diet, despite their relatively high energy density.

Last but not least, considering the Nutriscore in the context of ongoing EU Nutrient profiles discussions, the current scoring of the Nutriscore deprives all bottled vegetable oils and fats from making an EU approved nutrition or health claim, should it be capped at "A" and "B" scores. FEDIOL considers that this is not in line with national, international and other global nutritional guidelines identified in Annex 3. This would further constitute a discrimination for bottled vegetable oils and fats, which would not be able to improve their current Nutriscore scoring due to the impossibility to reformulate single origin botanical oils – whilst processed foods having vegetable oils/fats as an ingredient would.

In annex to this document, you will find:

- 1) **Annex 1** - The FEDIOL detailed assessment and suggestions to modify the Nutriscore algorithm to take into considerations "high in unsaturated fat" and "high in omega 3" content in bottled vegetable oils and fats – in line with EU, national and International guidelines and EU health and nutrition claims.
- 2) **Annex 2** - The scientific evidence highlighting the benefits of unsaturated fats, polyunsaturated fats and omega 3 incl. in EFSA assessments.
- 3) **Annex 3** – The EU Member States national, international and other global dietary guidelines highlighting that unsaturated fat, polyunsaturated fatty acids and/or omega 3 are to be favoured and saturated fat replaced by unsaturated fat.

We thank you for your consideration. My colleague [REDACTED] ([REDACTED]@fediol.eu) remain at your disposal to further discuss the details of our FEDIOL proposal for the adjustment of the Nutriscore algorithm.

Best regards,

[REDACTED]

FEDIOL [REDACTED]