

Joint Research Centre  
DG SANTE  
FAO  
Heidi Moens & Jan Wollgast

Dear Heidi & Jan

### **Regarding FOP nutrition labelling schemes**

I would like to share with you the opinion of EFAD's European Specialist Dietetic Network on Public Health (ESDN PH) regarding the proposed "Evolved Nutrition Labelling" front-of-pack nutrition labelling scheme

#### **Considering that:**

- Front-of-pack nutrition labelling schemes (FOP) must be clear and easy to understand, should be evidence based and without any conflict of interest, especially with the food industry sector, in order to be solid and reliable and to facilitate understanding by the consumer.
- The use of a colour code or symbol can help consumers to quickly compare the nutrient content of a given nutrient or the nutritional value as a whole of any food in the same category.
- A mandatory FOP scheme in the EU would be the most appropriate way to inform European consumers, but since the labelling is voluntary, the adoption of a preferred model should be endorsed by the public health agencies of each member state.
- The proliferation of numerous FOP schemes can contribute to the confusion of European consumers when it comes to making responsible decisions with their health status.
- The harmonization in Europe of a nutrition profiling scheme could facilitate a single, consistent and robust labelling system throughout the EU.

#### **The ESDN PH argues that:**

1. Using portion size instead of 100g/ml as a basis to define the colour to be applied by the FOP scheme of products sold in small portions, is a clear way to reduce the presence of "red" and "amber", or their ranges of colours, in ultra-processed products which are likely to be rich in salt, saturated fats and/or sugars, making healthy choices difficult for EU consumers.
2. The portion sizes currently suggested in some categories (breakfast cereals, snacks, chocolates, sweets, etc.) are smaller than the amount that is normally consumed at any given time. Portion sizes used for marketing purposes generally don't match with those proposed in the labelling, promoting larger portions than those suggested. Or smaller portions result in two portions of the product being consumed i.e. 2 small bags of crisps which would then affect the interpretation of the coding.
3. Nutrient value by portion is valuable information to be displayed in the labelling (FOP or nutrition information table) but portion sizes differ from one country to another, and even between regions of a given country, so the amount of food normally consumed depends not only on the culture and gastronomy, but also on the eating habits of its populations, especially regarding food categories, that do not have deep roots in their eating patterns. Thus, it should be the Member States that establish the portion sizes of the different food groups to be used in labelling, using validated methods and

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considering at least the range of food portions available in the market within every category, the quantity of food consumption measured in the national nutrition surveys, the nutritional equivalence between foods of the same category and the portions recommended by the Food Based Dietary Guidelines of a country.

4. The 100g / 100ml reference for nutrient value is the basis of EU food regulations and has the same meaning in all Member States, therefore it should be used as the basis to select the colour or the symbol that is applied in a given FOP scheme. However, although nutritional value by portion on the FOP labelling would be very valuable information for consumers, the portion needs to be validated by the Food Based Dietary Guidelines of a country.

**In conclusion**, the ESDN PH believes that *"combining colour-coded Reference Intakes with a portion element instead of 100g / 100ml for those products to be sold in small portions will not help consumers to make healthier choices, but will result in a FOP colour scheme with less red or its ranges, in products which are likely to be high energy density and high in saturated fatty acids, total fats, added sugars and / or salt, making it difficult to choose foods with a better nutritional profile in a category"*.

As a final remark, we believe that it is important not to overlook the importance of increasing food literacy rates, thus empowering populations to raise awareness and ability to read and understand labelling information and to make healthy and responsible choices. Coherent policies are needed to promote a healthy and sustainable diet, in whose approach, development and implementation dietitians should be part and in which areas of action to be considered, among others are:

- Regulate the advertising of ultra-processed foods rich in salt, sugars and / or saturated fats
- Consider the implementation of:
  - taxes for certain nutrients such as added sugars, saturated fatty acids or trans fatty acids, likely to be contained in many ultra-processed foods
  - incentives on fresh food like fruit and vegetables, pulses, nuts, etc., especially if they are produced in a sustainable way.
- Adopt a harmonized nutritional profiles scheme across EU to regulate the use of nutrition and health claims
- Strengthen and improve food reformulation strategies
- Establish compulsory food-nutrition education in school
- Promote healthy eating environments in the school, workplace, etc.

Yours sincerely

Judith Liddell  
EFAD Executive Director

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### [About The European Federation of the Associations of Dietitians \(EFAD\)](#)

EFAD was established in 1978 with aims to:

- Promote the development of the dietetic profession
- Develop dietetics on a scientific and professional level in the common interest of the member associations
- Facilitate communication between national dietetic associations and other organisations – professional, educational, and governmental

- Encourage a better nutrition situation for the population of the member countries of Europe.

**EFAD's ambitions:**

- Realise the contribution that dietitians can make to the improvement of nutritional health in Europe.
- Support the role of all National Dietetic Associations to contribute to the sustainability of economic and social health through influencing decision-makers both locally and in Europe.
- Embed best quality and evidenced-based dietetic practice in Europe through collaboration and partnership
- Promote education and lifelong learning in order to raise and maintain European dietetic standards

**Membership of EFAD** is open all National Associations of Dietitians from member states of the European Union. EFAD currently has 33 member associations, representing over 34,000\* dietitians in 29 European countries. (\*approximately 50% of all dietitians working in Europe)

**Definition of a Dietitian:**

A dietitian is a person with a qualification in Nutrition & Dietetics recognised by a national authority.

The dietitian applies the science of nutrition to the feeding and education of groups of people and individuals in both health and disease.

For further information please visit the web site: [www.efad.org](http://www.efad.org)