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## **COPA AND COGECA'S REFLECTION ON THE USE OF FRONT OF PACK (FOP) NUTRITION LABELLING SYSTEMS**

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## Key messages

- Copa and Cogeca consider that **providing nutritional information is beneficial to consumers**, notably as a means to compare different products based on their nutritional quality. This enables consumers to adopt a healthier and balanced diet.
- We indeed acknowledge the fact that **consumers are increasingly interested to know more about their food** considering also that lifestyle today is completely different and **the need to help people to make informed choices quickly**. This is why we welcome discussions on the possibility to set up an EU Front of Pack (FoP) Nutritional labelling system or on the need to set up criteria to be met when developing a system.
- The development of a possible EU-wide or other type of system should in fact be **science-based, meaningful** for all consumers and one that promotes a **positive approach that does not discriminate between agricultural products and other products that do not even feature as part of dietary recommendations**.
- We believe that **dietary recommendations are the key starting point** when establishing a possible FoP nutritional labelling system. This will avoid situations where products that do not even feature in dietary recommendations will score better than agricultural products rich in key nutrients such as essential amino acids, proteins, vitamins or minerals that on top of this feature in dietary recommendations (e.g. a reformulated soft drink vs orange juice vs milk).
- EU farmers and their cooperatives **strongly oppose colour coding systems** such as the traffic light that mislead consumers about the nutritious or health benefits of a product. **Their only focus on certain nutrients, thereby limiting and ignoring the overall nutritional contribution of agricultural products to our diet cannot** be further promoted.
- **Agricultural products** are an **essential source of different nutrients needed for good health** and **they are much more than just energy, salt, sugar or fat**.
- They include many different **essential vitamins, fibre, amino acids, essential fatty acids, and minerals**.
- **Education is essential** and has a **tremendous impact on dietary choices and habits**. A balanced diet provides an excellent basis for getting into the habit of eating ingredients needed to stay healthy. This means **eating a wide variety of foods from the different agriculture sectors in adequate proportions to achieve and maintain wellbeing, vitality and high living standards**. For example, the widely known food pyramid is an example that proves the essential role that agricultural products play when building a balanced diet.

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## **I. INTRODUCTION**

Lifestyle-related health challenges including health inequalities have considerably increased in recent years. A sedentary lifestyle, poor dietary habits and physical inactivity are only some of the factors influencing how we live our lives and all of this comes with its effects on our health.

Indeed, poor dietary habits in children continue into adulthood, with the health implications outlined. This is why, education is very important and we strongly believe that it has a tremendous impact on food choice and dietary habits. A balanced diet provides an excellent basis for getting into the habit of eating ingredients needed to stay healthy. This means eating a wide variety of foods from the different agriculture sectors in adequate proportions to achieve and maintain wellbeing, vitality and high living standards.

Mealtimes are also meaningful social occasions to share quality time with family members, friends and groups of people together, not only a matter of consuming nutrients to sustain life.

Copa and Cogeca are pleased to note that the European Institutions consider nutrition as a very important element of the EU policies. A balanced diet and regular physical activity are essential for good health, and EU farmers and their agri-cooperatives play a key role not only in providing tasty, nutritious and high-quality food but also when it comes to strengthening the connection between food producers and consumers in addition to the link with territories and nature.

If initiatives to help consumers to know more about the properties of their food are developed, we believe it is essential to contribute to the desired effect in terms of consumers' perception and to avoid simplistic proposals that will potentially mislead consumers even more about the real characteristics of their food (i.e. empty-calorie foods Vs nutrient-dense foods).

Unfortunately, we have seen how over the last few years nutrition and diets are becoming increasingly driven by trends most of which have no scientific basis.

Over the last few years, we have also seen a number of developments in the area of nutrition labelling and nutritional information not only in the EU but also in many third countries. For example, we have seen a significant increase in the number of Front of Pack (FoP) Nutrition labelling systems, some of which are misleading since they provide negative information on what should not be eaten while looking only at a particular nutrient without considering the overall nutritional contribution of a product. Now, the Commission Services have decided to assess the situation and explore the possibility of developing criteria that voluntary FoP labelling systems should follow.

Considering this, we believe that it is the right time to analyse the situation and put forward our preliminary reflection and some recommendations.

## **II. REFLECTION ON THE DEVELOPMENT OF FOP NUTRITION LABELLING SYSTEMS IN EUROPE IN THE LAST YEARS**

The already known traffic-light labelling system has been used by some Food Business Operators (FBOs) in the last years in UK. Red, amber and green colours are used to inform consumers whether a product has a high, medium or low content of fat, saturated fat, sugars and salt. During this time, Copa and Cogeca have strongly advocated against the traffic light system in UK<sup>1</sup>.

We consider that this model creates unnecessary confusion, and does not help consumers to make a healthy choice. It may even lead to erroneous choices being made. It takes no account of the very positive overall nutritional contribution which some foods (for example, cheese, butter,

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<sup>1</sup> Copa-Cogeca's concerns regarding the Traffic light hybrid system in the UK [CC\(13\)7499 \(rev.2\)](#); [CC\(17\)1825 \(rev.1\)](#)

olive oil, some meat products, etc.) can actually make despite the fact of having a bit of salt or fat content<sup>2</sup>. Moreover, it is only focused on the total quantity of a particular nutrient without looking at the quality (i.e. different types of fat or sugar).

In addition, the system is not compatible with some European policies such as the EU agricultural product quality policy and leads *de facto* to a categorization of products. Some of them benefiting from EU Quality schemes (PDO, PGI, TSG) will be marked red, despite the fact that they are nutritious high quality products, giving an unfair advantage to other products that can change their recipe without being necessarily healthier. It must be stressed that product specification under EU Quality schemes specifies the characteristics of a quality product and does not allow for any changes to be made to ingredients or recipes.

Moreover, colour coding tends to draw consumers' attention to what should not be eaten based only on one particular nutrient, and does not take into consideration the fact that primary products provide consumers with many other essential nutrients.

A diet that consists exclusively of green light products can easily be unhealthy and this constitutes one of the long-term risks of the system. Consumers may get the impression that it is better if all of the products that they purchase have a green light label. The red light can have a strong negative influence on consumers and penalise products creating a sense of false security by promoting unlimited consumption of "green" foods. We doubt that consumers will be able to understand and interpret these labels correctly.

Recently, a group of multinationals (Nestlé, Unilever, PepsiCo, Coca Cola, Mondelez) also decided to promote a traffic light system linked to portions called Evolved Nutrition Label ("ENL"). This is probably the most complex scenario considering that the vast majority of products from these companies do not even feature in dietary recommendations (i.e. soft drinks, chocolate snacks, etc.) in terms of consumers' perception. The fact that their system is linked to portions defined by themselves will probably help many of these products to look "better". This can potentially have some unintentional consequences by promoting unlimited consumption of "green products" (many of them probably being empty calories) from these companies representing a big market share.

Contrary to these systems that tend to focus the attention on what should not be eaten, there are other systems that promote positive discrimination such as the Keyhole in Nordic countries or the Healthy choice logo.

The Keyhole<sup>3</sup> contributes to help people to meet the Nordic countries' dietary guidelines and highlights healthier alternatives within the different product groups. To be allowed to display the Keyhole label, products must contain less salt and sugar, less or healthier fats, and more whole grains than comparable products and is found on a wide range of food products including bread, grains, dairy products, oils, etc.

At the same time, all fresh fruits, vegetables, fish and lean meat must be feature the label automatically promoting clearly primary products as part of a balanced diet. It should also be noted that when it comes to ensuring a balanced diet, primary products are generally an essential part and then there are other categories to be consumed more sporadically.

The most recent system to be developed has been the French one proposed by the government called 'Nutri score'<sup>4</sup>. It gives a rating to any food going from a dark green A (best) to a red E (worst), by weighing the prevalence of bad and good nutrients.

Even if the system is also supported by colours and can also lead to a categorisation of products, it is less discriminatory and more constructive than the traffic light system since it seeks to take

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<sup>2</sup> Copa and Cogeca main messages on colour coding: [DA\(17\)9207 \(rev.1\)](#)

<sup>3</sup> <https://www.norden.org/en/news-and-events/images/grafik/logos/noeglehullet/view>

<sup>4</sup> [https://ec.europa.eu/health/sites/health/files/nutrition\\_physical\\_activity/docs/ev\\_20171130\\_co04\\_en.pdf](https://ec.europa.eu/health/sites/health/files/nutrition_physical_activity/docs/ev_20171130_co04_en.pdf)

into account the overall nutritional contribution by weighting the prevalence of the different nutrients including:

- Negative points (until 40) on the basis of the following nutrients per 100 g: Energy (KJ), simple sugars (g), saturated fats (g) and sodium (g)
- Positive points (until -15) on the basis of the different elements per 100 g: fruits, vegetables, pulses and nuts (%), fibres (g) and proteins (g)

This means that a product would score between 40 that would mean to be a product of a very bad nutritional quality until -15 that would mean the best nutritional quality.

Both the main issue and the complexity of the exercise lie in the consumer's understanding and perception of these different systems. An overly simplified approach will lead the consumer to jump to conclusions and to misinterpret the nutrition declaration<sup>5</sup>.

In addition, it would be essential to measure whether they have the potential to achieve their intended goal (e.g. reducing overweight and obesity), especially those that have been in application for some years ago now such as the UK's traffic light system or the Scandinavian countries' Keyhole system.

### **III. NUTRITIONAL INFORMATION AS A WAY TO BETTER INFORM CONSUMERS ABOUT THE BENEFITS OF AGRICULTURAL PRODUCTS**

1. **Agricultural products** are an **essential source of different nutrients needed for good health** and **they are much more than just energy, salt, sugar or fat.**
2. They include many different **essential vitamins** (A, B1, B2, B3, B5, B7, B12, C, D, E, K, folate), **fibre, amino acids, essential fatty acids, and minerals** such as calcium, iron, magnesium, potassium, phosphorus, selenium or zinc, etc.
3. Copa and Cogeca consider that providing nutritional information is beneficial to consumers, notably as a means to compare different products based on their nutritional quality. This enables consumers to adopt a healthier and balanced diet.
4. We indeed acknowledge the fact that **consumers are increasingly interested to know more about their food** considering also that lifestyle today is completely different and **the need to help people to make informed choices quickly**. This is why we welcome discussions on the possibility to set up an EU Front of Pack (FoP) Nutritional labelling system or on the need to set up criteria to be met when developing a system.
5. The development of a possible EU-wide or other type of system should in fact be **science-based, meaningful** for all consumers and one that promotes a **positive**

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<sup>5</sup> Section 3 of Chapter IV of the Regulation (EU) No 1169/2011 of the European Parliament and of the Council on the provision of food information to consumers

**approach that does not discriminate between agricultural products and other products that do not even feature as part of dietary recommendations.**

6. In view of the ongoing analysis of the different existing schemes and the possibility of having more of them developed in the future (either by national authorities or through private initiatives), **Copa and Cogeca make a strong plea to the Commission to develop a minimum set of criteria that should be met and respected** by all the existing schemes.
7. We believe that **dietary recommendations are the key starting point** when establishing a possible FoP nutritional labelling system. This will avoid situations where products that do not even feature in dietary recommendations or that represent empty calories will score better than agricultural products rich in key nutrients such as essential amino acids, proteins, vitamins or minerals that on top of this feature in dietary recommendations (e.g. a reformulated soft drink vs orange juice vs milk).
8. **Education is essential** and has a **tremendous impact on dietary choices and habits**. A balanced diet provides an excellent basis for getting into the habit of eating ingredients needed to stay healthy. This means **eating a wide variety of foods from the different agriculture sectors in adequate proportions to achieve and maintain wellbeing, vitality and high living standards**. For example, the widely known food pyramid is an example that proves the essential role that agricultural products play when building a balanced diet.
9. EU farmers and their cooperatives **strongly oppose colour coding systems** such as the traffic light that mislead consumers about the nutritious or health benefits of a product. **Their only focus on certain nutrients, thereby limiting and ignoring the overall nutritional contribution of agricultural products to our diet cannot** be further promoted. Moreover, they can *de facto* lead to a misleading categorisation of products and make people feel guilty without justification when making certain choices.
10. The use of colour coding systems has led to situations where products that are not even needed in a diet score better than agricultural products that provide many different nutrients to our body having therefore a negative impact on consumers' perception.
11. In addition, Copa and Cogeca believe that, in order to ensure that clear and relevant information on nutritional aspects is provided, a common approach would be desirable so as **to avoid market distortions**.
12. To be helpful to consumers and genuinely address the issue of obesity and its health consequences, nutrition must always be presented in the full context of **balanced diet, physical activity and overall lifestyle**.
13. Ideally, **this kind of initiative should also be diet-related and not product-specific** while taking into account the overall nutritional intake as part of a diet.
14. Nevertheless, if there is a desire to simplify nutritional information, this simplification should not result in encouraging the exclusion of certain foods regardless of their nutritional merit and overall nutritional contribution when eaten sensibly. **We have never had as many diet product choices, and yet overweight and obesity incidence continues to increase**. Agricultural products have always existed but the fact that probably today people cook less, consume more away from their homes and have a more stressful lifestyle does not help. It is therefore important to continue to stress the essential role of agricultural products as part of a balanced diet and the need to be an informed cook and pay enough attention to and make the time for food in our lives.

15. It is also crucial to ensure that these systems take into account the different nutrients and their specificities ensuring also that the overall nutritional contribution of the product is considered. For example, natural sugars vs added sugars, natural trans fats vs industrial trans fats, saturated fats vs unsaturated fats or the contribution of minerals and vitamins, proteins, fibre, etc.
  16. It is therefore essential to avoid the collateral impact of these simplistic systems on agricultural products linked to possible impacts on consumer perception. For example, products that are not limited in composition are in a “better” position to reformulate their recipes in order to present their products as “healthier”. On the other hand, **primary products with natural composition are not in a position to reformulate and therefore there is a risk that may impact consumer perception.**
  17. There is evidence that products having a health claim can be perceived as being healthier compared with foods without claims recommended in daily diets such as fresh fruit and vegetables or fibre-rich carbohydrates. This must be avoided.
  18. This is why, it is of the utmost importance to ensure that the **nutrient value largely defined by the primary product is strongly communicated.**
  19. Of course, we also believe that it is **important to promote food product improvement.** Nevertheless, **this must not be achieved at the expenses of discriminating agricultural products.**
  20. **Development of these systems should be generally submitted to public consultation and official scrutiny.** This is also especially relevant when we refer to initiatives that have been developed by private operators (such as the ENL initiative developed by multinationals) behind which there is also probably a commercial interest.
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