



## Farm to Fork: EPHA submission on front-of-pack nutrition labelling

Brussels, 2 February 2021

The European Public Health Alliance (EPHA) has for many years supported front-of-pack (FOP) nutrition labelling as part of a wider policy mix to create health-enabling food environments.<sup>1 2</sup> A well-designed FOP labelling scheme can help consumers identify healthier food options, promote the uptake of healthier diets and foster the reformulation of products.<sup>3 4</sup>

EPHA supports an FOP labelling scheme that is:

- Based on the mission to promote good health;
- Mandatory;
- Interpretative;
- Based on uniform reference values (e.g. per 100g or 100ml);
- Mixed, in terms of highlighting both positive and negative attributes;
- In line with the World Health Organization (WHO) 15 draft principles on FOP labelling schemes.<sup>5</sup>

Currently, different FOP schemes are available in Europe.<sup>6 7</sup> A discussion on the relative merits of different models needs to distinguish between two key dimensions:

1. The quality of the graphic design;
2. The quality of the nutrient profile underlying the model.

Among available schemes, Nutri-Score has come forward as an important contender that aligns with the criteria above. Recent studies tend to point favourably towards this model, both in terms of visual characteristics,<sup>8 9 10</sup> and the nutrient profile, which was found to help improve the

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<sup>1</sup> BEUC, EHN, EPHA (2017) Joint Statement I The time is ripe for simplified front-of-pack labelling

<sup>2</sup> Joint letter (2020) Call for a mandatory EU-wide Front of Pack nutrition labelling system with a public health mindset

<sup>3</sup> Shangguan et al. (2018) A Meta-Analysis of Food Labeling Effects on Consumer Diet Behaviors and Industry Practices. *Am J Prev Med*

<sup>4</sup> Cecchihi & Warin (2015) Impact of food labelling systems on food choices and eating behaviours: a systematic review and meta-analysis of randomized studies. *Obesity Reviews*

<sup>5</sup> WHO (2019) draft: Guiding principles and framework manual for front-of-pack labelling for promoting healthy diets

<sup>6</sup> European Commission (2020) Report regarding the use of additional forms of expression and presentation of the nutrition declaration. COM(2020) 207 final

<sup>7</sup> Storcksdieck et al. (2020) Front-of-pack nutrition labelling schemes: a comprehensive review. *Joint Research Centre of the European Commission*

<sup>8</sup> Egnell et al. (2018) Objective understanding of front-of-package nutrition labels: An international comparative experimental study across 12 countries. *Nutrients*

<sup>9</sup> Vandevijvere et al. (2020) Consumers' food choices, understanding and perceptions in response to different front-of-pack nutrition labelling systems in Belgium: results from an online experimental study. *Archives of Public Health*

<sup>10</sup> Egnell et al. (2019) Consumers' Responses to Front-of-Pack Nutrition Labelling: Results from a Sample from The Netherlands. *Nutrients*



nutritional quality of shopping baskets.<sup>11</sup> Compared to other systems, it furthermore appears to perform somewhat better with people with a lower adherence to nutritional recommendations.<sup>12</sup>

At the same time, questions have also been raised about Nutri-Score's performance on a number of health-relevant dimensions. This especially in terms of its relation to national dietary guidelines, whole grains, artificial sweeteners and the emerging evidence about ultra-processed foods.<sup>13 14</sup>

Simultaneously, it should be observed that in contrast to a range of other models, Nutri-Score allows for a more holistic evaluation of food products and, as a 'living system', can be updated over time as evidence about different food-health dimensions evolves and solidifies.

Based on these considerations, EPHA supports the view that *"a scientific committee of independent experts should be established to review and adapt the algorithm underpinning Nutri-Score and to assess whether and under what conditions the algorithm may be converted into a pan-European label."*<sup>15</sup>

After selecting and proposing the most relevant FOP modalities, such expert panel should preside over the process of regular further adaptations of the algorithm, should the need arise in light of evolved evidence.

As additional considerations:

- FOP labelling is not a 'silver bullet', and any scheme should be rolled-out with a comprehensive information and education campaign to clarify the scheme, how to make best use of it, and to specify how it fits within a wider approach to promoting healthier food environments and diets, especially in view of increasing fresh fruit and vegetables consumption.
- EPHA considers that any future mandatory FOP labelling scheme should extend to include alcoholic beverages, thereby ending the exemption for drinks containing more than 1,2% of alcohol by volume.
- While the aim should be to establish an EU-wide mandatory scheme, Member States should, in the absence of an EU scheme, not be prevented from making the FOP labelling system of their choice mandatory at a national level.
- EPHA strongly opposes suggestions made about excluding from FOP labelling products bearing Geographical Indications (GIs). That such products may not be easily reformulated is counterbalanced by the recognition that GI labels bestow on covered products.
- A further discussion is required about how other relevant dimensions could be more clearly and uniformly addressed on product packages, including those related to allergen content and synthetic additives.

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<sup>11</sup> Crosetto et al. (2017) Modifications of food purchases in response to five nutrition simplified labelling. *Cahiers de Nutrition et de Diététique*

<sup>12</sup> Julia et al. (2017) Perception of different formats of front-of-pack nutrition labels according to sociodemographic, lifestyle and dietary factors in a French population: cross-sectional study among the NutriNet-Santé cohort participants. *BMJ Open*

<sup>13</sup> European Heart Network (2020) Front-of-pack (FOP) nutrition labelling – European Heart Network position

<sup>14</sup> SAFE Food Advocacy Europe (2020) A need for a common Front-of-Pack nutrition label

<sup>15</sup> European Heart Network (2020) Front-of-pack (FOP) nutrition labelling – European Heart Network position

