

JOINT LETTER

Europe needs a mandatory EU Front-of-Pack nutrition labelling system that rules out exemptions for certain products, in order to truly protect public health

To:

Members of the European Parliament from the AGRI and ENVI committees

Brussels, 8 September 2021

Dear MEPs,

Ahead of the committee vote on the own-initiative report on the Farm-to-Fork Strategy, taking place on 9-10 September, the undersigned organisations want to reiterate the importance of **a harmonised, interpretative and mandatory EU front-of-pack (FOP) nutrition labelling system** and ask the European Parliament to **put public health perspectives above** trade considerations or regional/local business preferences, notably by **standing firm against exemptions for regionally produced products**.

Indeed, public health is the very reason for the Commission's decision to put forward a proposal by end 2022. The Commission states in the Farm to Fork Strategy that it will propose such a scheme "to enable consumers to make health conscious food choices"¹.

The adoption of a formal and comprehensive system² provides a **unique opportunity to empower consumers** to make the choices that are best for them; while creating a healthier food environment, improving dietary patterns and promoting healthy lifestyles.

Exemptions will undermine the aim of the system to be implemented uniformly and consistently. Allowing certain food producers and products - be they regionally produced - to opt out of using such a label would prevent consumers from having a full overview and would confuse or mislead them about the healthfulness of products. Existing Geographical Indication (GI) labels already recognise the specific quality of such products, which should however not be confused with nutritional composition. Further, specific food types such as those for babies and young children should not be exempted, in particular because many of these products are also high in sugar and salt. This is a crucial age of development where quality nutrition plays a great role in health and wellbeing and many risks associated with unhealthy diet begin in childhood.

Poor nutrition is a major well-known risk factor for chronic (non-communicable) diseases³ notably cardiovascular and digestive diseases, diabetes and cancer. A well-designed mandatory FOP nutrition labelling can play a significant role in lowering the incidence of chronic diseases and obesity. In the

¹ Communication from the European 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. May 2020. Available at: https://eur-lex.europa.eu/resource.html?uri=cellar:ea0f9f73-9ab2-11ea-9d2d-01aa75ed71a1.0001.02/DOC_1&format=PDF

² European Heart Network. Front-of-pack (FOP) nutrition labelling – European Heart Network position. July 2020. Available at: <http://www.ehnheart.org/publications-and-papers/position-papers-and-statements/1283:nutri-score-could-become-eu%E2%80%99s-front-of-pack-nutrition-labelling-if-its-underlying-algorithm-is-revised.html>

³ Deschasaux M, Huybrechts I et al. Association between nutritional profiles of foods underlying Nutri-Score front-of-pack labels and mortality: EPIC cohort study in 10 European countries. *BMJ* 2020;370:m3173

EU, over 950,000 deaths and over 16 million Disability Adjusted Life Years (DALYs)⁴ - lost years of "healthy" life - are attributable to dietary risks due to unhealthy diets⁵, including high intake of sugar, salt and saturated fats and low intake of fibre. FOP nutrition labelling systems are effective evidence-based policy tools to address this modifiable risk factor.

The COVID-19 pandemic has further outlined the vulnerability of people living with chronic diseases, stressing the importance of addressing the increasing burden of chronic diseases, notably by improving prevention measures^{6,7}.

Health is the cornerstone of strong, sustainable economies and societies. Not only is it a fundamental human right embedded in EU treaties, it is the collective responsibility of a European Health Union. We therefore count on you to **adopt an approach for the EU front-of-pack labelling system that will ensure a high-level of protection for European citizens and provide for better public health.**

Your vote can send a strong signal of your commitment to help prevent diet-related chronic diseases, by supporting a health-enhancing FOP labelling system that rules out exemptions for certain products. In the context of the Global Week for Action on NCDs, it would take an even greater significance.

Thank you in advance for your consideration. The undersigned remain available for any further evidence.

Yours sincerely,



European Chronic Disease Alliance (ECDA) – The European Chronic Disease Alliance (ECDA) is a Brussels-based coalition of 11 European health organizations representing major chronic diseases and sharing the same interests in combating preventable chronic diseases through European policies that impact health. Together, we represent over millions of patients and over 200,000 health professionals. ECDA plays a leading role in the prevention and reduction of chronic diseases by providing policy recommendations based on contemporary evidence. www.alliancechronicdiseases.org



European Patients' Forum (EPF) – EPF is an umbrella organisation of patient organisations across Europe and across disease-areas. Our 75 members include disease-specific patient groups active at EU level and national coalitions of patients. www.eu-patient.eu

⁴ World Health Organisation. Metrics: Disability-Adjusted Life Year (DALY). Definition. Available at: https://www.who.int/healthinfo/global_burden_disease/metrics_daly/en/

⁵ Estimates from the Global Burden of Disease study. Burden of Disease in the EU in 2017. Available at: <https://ec.europa.eu/irc/en/health-knowledge-gateway/societal-impacts/burden>

⁶ European Chronic Disease Alliance. June 2020. Statement on COVID-19, chronic diseases and EU health capacity. Available at: <https://alliancechronicdiseases.org/wp-content/uploads/ECDA-statement-on-COVID-19-chronic-diseases-and-EU-health-capacity-June-2020.pdf>

⁷ European Patients' Forum. May 2021. Survey Report - Impact of COVID-19 Pandemic on Patients & Patient Organisations. Available at: https://www.eu-patient.eu/globalassets/covid19-survey-report_final.pdf



European Public Health Alliance (EPHA) – EPHA is a leading European NGO alliance advocating for better health. A member-led organisation made up of public health NGOs, patient groups, health professionals and disease groups, we work to improve health and strengthen the voice of public health in Europe. As part of its priorities EPHA advocates for policies to tackle the common risk factors to non-communicable diseases (NCDs), and advance a transition towards resilient, sustainable food systems with health-enabling food environments.
www.ephpa.org



European Public Health Association (EUPHA) – EUPHA is an umbrella organisation for public health associations in Europe. Our network of national associations of public health represents around 20 000 public health professionals. Our mission is to facilitate and activate a strong voice of the public health network by enhancing visibility of the evidence and by strengthening the capacity of public health professionals.
<http://www.eupha.org>