

IMACE POSITION ON FRONT PACK LABELLING

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Overview of Front of Pack Labelling (FOP)

As per Regulation (EU) No 1169/2011 on the provision of food information to consumers (FIC), the European Commission's Joint Research Centre released a report on the use and effectiveness of front-of-pack (FOP) labelling schemes. FOP labelling is meant to educate consumers about foods and push the producers to reformulate the products for a health benefit for all. The [2020 JRC FOP Labelling Report](#) concludes that FOP labelling proves useful in helping consumers make 'health-conscious food choices', and supports efforts to prevent diet-related non-communicable diseases. It further advises on the need for a common, harmonised approach to FOP nutrition labelling in the EU.

In Europe, several systems have been developed: the UK Food Standards Agency (FSA) traffic light scheme (2011); the FR - Nutri-Score Labelling (2017); the keyhole symbol used in Sweden, Denmark and Norway to identify healthier options; and the NutrInform battery in Italy (2020). It seems that the French Nutri-Score labelling is getting most traction as several countries (Spain, France, Belgium, Portugal, Germany and the Netherlands) and multinationals such as Nestlé, Danone and several retail brands adopted this voluntary labelling.

IMACE views on FOP schemes

IMACE is supportive of initiatives that aim to provide consumers with easy-to-understand and non-misleading information related to the nutritional characteristics of foods, and beyond the mandatory nutrition declaration pursuant to Regulation (EU) No 1169/2011 (i.e. recommended intake per 100 g and/or portion/serving).

IMACE, nonetheless, invites the European Commission to take the following considerations into account when developing a FOP scheme.

- Any scheme should be **voluntary, non-discriminatory** and in accordance with transparent and objective criteria based on robust and sound **scientific evidence**;
- Criteria should be set by an **independent** scientific expert group;
- Any scheme should include **all food products**, whether they are complex or single-nutrient foods, and assess them according to their place in a healthy diet;
- Any scheme shall take into account the total nutritional value of the food, i.e. all nutrients (in the case of margarine and spreadable fats: vitamins, minerals, omega 3 fatty acids, MUFA, PUFA, DHA/EPA, etc.);
- FOP labelling shall not mislead the consumer to make choices that are against nutritional recommendations from health organisations (WHO '[A healthy diet sustainably produced](#)') and national dietary guidelines and national authorities (e.g. Dutch '[Wheel of Five](#)', Swedish '[Nordic Nutrition Recommendations](#)');
- FOP labelling should make the distinction as to whether foods' nutritional value is assessed per 100 g/100 ml or per portion. The latter would be more relevant for certain categories of products such as margarine and spreadable fats;
- The system shall have broad support from the industry, health professionals, consumer organizations, retailers and government;
- The scheme should be **harmonised** across the EU to **avoid discriminatory practices** and diverging consumer perception of a same product. Common FOP nutrition labelling should also take care of avoiding double standards in assessing food products from a same category – for instance, the fats category which gathers butter, margarine, blends and other types of spreads;
- FOP nutrition labelling schemes should allow for companies to communication about effective reformulation efforts, which is the primary intention of the EU food law.

In conclusion, IMACE is of the opinion that **food products that consist of mainly one nutrient shall be carefully considered regardless of the FOP scheme**, always in the context of a healthy and balanced diet¹.

¹ Margarines, fat spreads, blends for spreading and/or cooking (regulation 1308/2013: categories B & C).