

## **NON PAPER of Cyprus, Czech Republic, Greece, Hungary, Italy, Latvia and Romania on the “Front of Pack Nutrition Labelling” (FOPNL)**

The aim of this document is to provide a contribution to the discussion on harmonized Front of Pack Nutrition Labelling (FOPNL) at EU level.

### **Background**

- Current EU Regulation 1169/2011/EU on food information to consumers obliges food business operators to display a **nutrition declaration on processed prepacked foods**, which provides information on the amount of **seven key nutritional elements** (fat, saturated fats, carbohydrates, sugar, protein, salt and energy) per 100g/100ml of the product.
- This means that consumers currently **have enough information** about the nutritional value of food and contribution to their overall daily diet.
- EU Regulation <sup>1</sup> improved legibility of information (minimum font size for mandatory information).
- The same EU Regulation also harmonizes the rules for the **voluntary** forms of expression and presentation of nutrition information and the rules for additional **voluntary food information**. Several formats are present in the EU: the “Healthy Choices”, the “Heart” logo, the “Keyhole”, the “Nutrinform Battery”, the “Nutri-Score” and the “Traffic Light” system.
- On May 20, the EU Commission published the “Farm to Fork Strategy”, aimed at improving the sustainability of the EU food system. At the same time, the EU Commission released a Report on the use of additional forms of expression and presentation of the nutrition declaration. Incidentally, the Report states that empirical evidence to assess the impact of FOPNL on nutrition and consumer health is currently insufficient.

### **Building blocks: Consumer information and understanding**

- The sustainability of food systems is a crucial element of the Farm to Fork Strategy.

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<sup>1</sup>Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers,

- FOPNL has been identified as a tool to help consumers make more informed and correct food and drink choices, thus contributing to the primary goal of curbing diet-related diseases.
- We are ready to discuss the most suitable approach to FOPNL with an open mind, in the best interest of citizens and believe that already established market-led solutions should not run ahead of EU Commission, Governments and regulatory authorities in determining decisions that have major implications on public health, cultural values and the internal market.
- Food is part of our cultural heritage. If a new harmonized FOPNL scheme is introduced, it should exempt the Protected Designation of Origin (PDO) products, Protected Geographical Indication (PGI) products, Traditional Specialities Guaranteed (TSG) products and single ingredient products (e.g. olive oil) from the requirement of using it.
- The suitability of a FOPNL scheme depends not only on the perception of the average consumer as to the usability of labelling information, but also on the premise that the scheme should not potentially direct the average consumer towards nutritional choices which may not truly be healthy. Stressing the principle that FOPNL should not mislead consumer.
- Codex Committee on Food Labelling points out that MS generally support the draft **Guidelines** FOPNL however wish to **exclude specific types of food** from using FOPNL, such as specific foods for infants and young children.
- It is therefore essential that any evidence produced to examine the effectiveness of a FOPNL scheme can demonstrate that **consumers understand** the scheme.
- An EU-harmonized FOPNL scheme should have an educational content, promote knowledge and complement nutritional education policies. It should never conflict with national dietary guidance.
- Color codes have not shown to be effective in helping consumers to evaluate the real nutritional quality/value of food. Therefore, an EU-harmonized FOPNL should **consider foods as part of the wider context of the daily requirements of a healthy diet**, encouraging variation, moderation and a correct balance of all food groups.

- The system **should not** provide an overall evaluation of a food, but factual information on the individual nutrients contained in a product, in order to make sure that each consumer can choose according to his/her particular conditions and state of health.
- If a new European harmonized Front-of-Pack nutritional labelling scheme were to be introduced, it should be in the interest of the single internal market and the level playing. It should also be voluntary in order to avoid **unnecessary burden** on the Food Industry and Food Business Operators especially on small businesses. Nevertheless, Member States might introduce EU harmonized FOPNL as mandatory at national level, if appropriate.
- An EU-harmonized FOPNL system should take into account the **actual daily intake** of foods and beverages, **rather than a generic threshold of 100g/100ml**, in order to avoid the penalization of those foods that are usually consumed in small amounts.
- An EU-harmonized FOPNL system should take into account the **specificities of each Member State's food culture, typical diet and national nutritional guidelines**.