

The Consumer Voice in Europe

FRONT-OF-PACK NUTRITIONAL LABELLING

BEUC Position



Contact: Emma Calvert – food@beuc.eu

BUREAU EUROPÉEN DES UNIONS DE CONSOMMATEURS AISBL | DER EUROPÄISCHE VERBRAUCHERVERBAND

Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • www.twitter.com/beuc • www.beuc.eu

EC register for interest representatives: identification number 9505781573-45



Co-funded by the European Union

Ref: BEUC-X-2019-033 - 16/05/2019

Why it matters to consumers

One in two European adults is overweight or obese. Figures are particularly alarming for children, with one in three overweight or obese. Obesity and its health effects have severe consequences: not only at the personal level, but also in terms of public health due to the additional burden of health care costs on government budgets. In today's busy world, consumers make their purchase decisions in a matter of seconds. Food labels must therefore make the healthy option the easy option. All EU consumers should be able to make healthier food choices when they shop for groceries thanks to the introduction of a mandatory EU-wide front-of-pack nutritional labelling scheme with colour coding.

Contents

1. Background.....	1
2. BEUC Position.....	1
3. Government-led development and implementation	2
4. Interpretive: Meaningful colour-codes	2
5. Based on solid evidence.....	2
6. BEUC's recommendation for a Future System in the EU	3

1. Background

As levels of overweight and obesity remain worryingly high in Europe, it is increasingly clear that stronger action will be required to help stem this public health crisis.

While no 'silver bullets' exist for solving the obesity epidemic, front-of-pack nutritional labelling has been identified by both national governments and international public health bodies as a priority policy tool to help consumers make more informed and healthier food and drink choices¹.

2. BEUC Position

BEUC has campaigned for many years for a harmonised EU-wide mandatory front-of-pack colour-coded nutritional label to be adopted. We believe that all consumers across the EU, no matter where they live, should be able to benefit from nutritional labels which make informed and healthier choices easier. It is therefore essential that any front-of-pack nutritional label is easy to understand and can be used by consumers at-a-glance.

¹ WHO European Food and Nutrition Action Plan 2015-2020.

3. Government-led development and implementation

It is essential that any FOPNL is trusted and seen as credible by consumers, the intended users of the label. Given that the central purpose of such schemes should be to help consumers to make more informed and healthier food choices and the responsibility for the protection and promotion of the health of citizens ultimately lies with government authorities, it is essential that the development and implementation of a FOPNL is transparent and government-led. It is crucial that conflicts of interest are safeguarded against and stakeholder input is carefully managed by government oversight.

4. Interpretive: Meaningful colour-codes

Current EU law mandates food and beverage producers to display a nutrition declaration which gives information on the amount of seven key nutritional elements (fat, saturated fats, carbohydrates, sugar, protein, salt and energy) per 100g/100ml of the product. However, this is found on the back-of-pack, in very small font and crucially does not interpret the information for consumers, making it difficult to use in shopping situations where food purchasing decisions are made in a matter of seconds.

This is why it is so important that a FOPNL is designed to simplify nutritional information so that consumers are able to use at-a-glance in a meaningful way without having to make complicated calculations when they are shopping. It is especially important that vulnerable consumers such as those from lower-socio economic groups can understand and use the label, as these consumers tend to have lower levels of nutritional knowledge and at the same time, be most at risk of becoming overweight and obese.

Rational colour codes have been shown to be effective in helping consumers to compare the nutritional quality of food and beverages – so long as these comparisons are relevant and useful to consumers to guide their choices – and ultimately to help them identify healthier choices. To be of the most use to consumers, a FOPNL should be applied across products and include both positive and negative evaluative judgements to better support consumers in making food selections.

Furthermore, to avoid misleading consumers and forcing them to make time-consuming and complicated calculations in order to compare products, any FOPNL should be based on uniform reference amounts such as per 100g/100ml.

5. Based on solid evidence

FOPNLs should be developed on the basis of rigorous, independent scientific evidence, conducted free from commercial interests.

- **Objective understanding**
 - o It is essential that any evidence produced to examine the effectiveness of a FOPNL scheme can demonstrate that consumers objectively understand the scheme. Research should be able to show that consumers can correctly classify products based on their nutritional profile.

- **Purchasing intention**
 - o As purchasing decisions are made in a matter of seconds, it would be especially useful to undertake real-life supermarket trials to examine the effectiveness of a given scheme on purchasing intentions in a time-pressured and realistic environment.

6. BEUC's recommendation for a Future System in the EU

There is no perfect system and it is important to ensure that regular systematic reviews can allow for certain improvements to the scheme, for example on the criteria and algorithm used, to take into account developments in scientific knowledge and in the food market.

On balance, BEUC believes that evidence²³ from research conducted in several countries shows Nutri-Score⁴ is currently the best-performing scheme in both aiding consumers to compare the nutritional quality of foods across a range of products and to make healthier purchasing choices. We would therefore advocate that the Nutri-Score system shall be the minimum basis for harmonisation of FOPNL across Europe. Moreover, where there is evidence to support that this works best in a national context, flexibility should be maintained for another scheme, such as the multiple traffic lights, to be used in addition to the Nutri-Score.

² Chantal Julia, Serge Hercberg, 'Development of a new front-of-pack nutrition label in France: the five-colour Nutri-Score', *Public Health Panorama*, Volume 3, Issue 4, December 2017.

³ Manon Egnell, Zenobia Talati, Serge Hercberg, Simone Pettigrew, and Chantal Julia, 'Objective Understanding of Front-of-Package Nutrition Labels : An International Comparative Experimental Study across 12 Countries', *Nutrients*. 2018 Oct; 10(10): 1542.

⁴ The Nutri-Score system gives food and beverages an overall nutritional rating on a scale which goes from 'A' to 'E' with corresponding colours ranging from dark green to red. It takes into account 'negative' elements such as sugar or salt but also includes 'positive' elements such as fibre and fruit and vegetable content.



This publication is part of an activity which has received funding under an operating grant from the European Union's Consumer Programme (2014-2020).

The content of this publication represents the views of the author only and it is his/her sole responsibility; it cannot be considered to reflect the views of the European Commission and/or the Consumers, Health, Agriculture and Food Executive Agency or any other body of the European Union. The European Commission and the Agency do not accept any responsibility for use that may be made of the information it contains.