

The background features a light blue map of the Americas, including North and South America. Overlaid on the map are several thick, colorful ribbons in shades of green, orange, blue, and red, which curve across the continent. A white rounded rectangle with a thin red border is centered on the map, containing the title and date.

AREPO BOARD OF PRODUCERS

March 26th 2021

Agenda

Presentation of the agenda of the meeting

Introduction of AREPO President, **Ms Eirini Choudetsanaki**

Welcome speech of AREPO Vice-Presidency

Front of Pack Nutrition Labelling: update and discussion on AREPO position

The background features a light blue map of Europe. Overlaid on the map are several thick, colorful ribbons in shades of green, orange, and blue, which curve across the continent. A white rounded rectangle with a thin red border is centered on the map, containing the title and name of the speaker.

INTRODUCTION OF AREPO PRESIDENT

Eirini Choudetsanaki

President of AREPO and Crete Regional Councillor

A stylized world map in light blue is the background. Overlaid on the map are several thick, colorful ribbons in shades of green, orange, and blue, which curve across the map. A white rounded rectangle with a thin red border is centered in the upper half of the image, containing the title and speaker information.

WELCOME SPEECH OF AREPO VICE-PRESIDENT

Nicola Bertinelli,

*Vice-President of AREPO and President of the Consorzio del Formaggio
Parmigiano Reggiano*

The background features a light blue map of Europe. Overlaid on the map are several thick, curved, semi-transparent ribbons in various colors: green, orange, blue, and brown. These ribbons appear to be flowing across the map, possibly representing trade routes or regional groupings.

FRONT OF PACK NUTRITION LABELLING: UPDATE AND DISCUSSION ON AREPO POSITION

Francesca Alampi
AREPO Policy Officer

FRONT OF PACK NUTRITION LABELLING: CONTEXT

- On 20 May 2020, the European Commission published the [Farm to Fork strategy](#), which has, among others, the objective of **promoting sustainable food consumption** and **facilitating the shift to healthy and sustainable diets**.



Harmonised mandatory front-of-pack nutrition label (proposal by the end of 2022)

- Food labelling at European level is disciplined by [Regulation \(EU\) 1169/2011 on the provision of food information to consumers](#) (FIC Regulation)
- On 20 May 2020 the European Commission adopted a [Report regarding the use of additional forms of expression and presentation of the nutrition declaration](#). It provides an overview of the main FOPNL schemes currently implemented or being developed at EU level. It also addresses consumer understanding, effectiveness and impacts of FOP schemes, as well as the effect of this labelling on health.

FRONT OF PACK NUTRITION LABELLING: CONTEXT

- Among the existing FOPNL schemes, the report focuses on the **“*evaluative*” schemes using colour-coding combined with a graded indicator**, notably the **Nutriscore**, resulting to be the **Commission’s preference** -> immediate understanding of a label
- The Commission’s report states that **there is not enough empirical evidence to draw conclusions on the positive impact of FOP labels on consumers’ diet and health.**
- EC warns on possible side effects of **perceiving certain food as healthy**
- Always with the purpose of facilitating the shift to healthier diets, the Commission intends to couple the proposal of a mandatory front-of-pack nutrition label with initiatives to **stimulate product reformulation** and to **set up nutrient profiles to restrict the promotion** (via nutrition or health claims) of foods high in fat, sugars and salt.

FRONT OF PACK NUTRITION LABELLING: CONTEXT

At the end of 2020, the European Commission published two roadmaps:

1) [Roadmap on Food labelling - revision of rules on information provided to consumers](#), which seeks feedback on the following proposals:

- to introduce standardised **mandatory front-of-pack nutrition labelling**
- to extend mandatory origin or provenance information for certain products
- to revise the rules on date marking ('use by' and 'best before' dates).

2) [Roadmap on Facilitating healthier food choices – establishing nutrient profiles](#)

Nutrient profiles are threshold of nutrients (such as fats, sugars and/or salt) above which nutrition and health claims are restricted, thus preventing a positive health message on foods with a non-healthy profile.


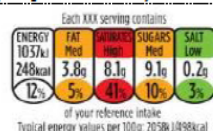


- **A public consultation will follow**
- The European Commission will prepare in 2021 an **impact assessment** analysing 5 policy options and it plans **to adopt its proposal by the end of 2022.**

FRONT OF PACK NUTRITION LABELLING: CONTEXT

INCEPTION IMPACT ASSESSMENT: To identify a **preferred option** or a **policy mix**

- **Option 0: Baseline ('business as usual')**
 - Either FOPNL schemes will remain **voluntary** and nutrient profiles are not set.
 - Or, **FOPNL is not harmonised**, but the Commission establishes nutrient profiles
- **Option 1: Nutrient-specific labels – numerical**
- **Option 2: Nutrient-specific labels – colour-coded**
- **Option 3: Summary labels – endorsement logos**
- **Option 4: Summary labels – graded indicators**

Table a. Summary of the policy options to be assessed

Nutrient-specific labels - examples		Summary labels - examples	
Numerical (Option 1)	Colour-coded (Option 2)	Endorsement logos (Option 3)	Graded indicators (Option 4)
 <p>ENERGIA 1057kJ / 248kcal GRASSI 3.8g / 7.6% ZUCCHERI 8.1g / 16.2% SALZ 0.2g / 0.4%SODIUM 9.1mg / 18.2%FIBRA 7.1g / 14.2% <small>Valori nutrizionali per 100g di prodotto Valori di riferimento di un adulto medio (8400 kJ / 2000 kcal) Per 100g: 1.567 kJ / 373 kcal</small></p>	 <p>Each 100g serving contains ENERGY 1057kJ / 248kcal FAT 3.8g / 7.6% CARBOHYDRATES 8.1g / 16.2% SUGARS 9.1g / 18.2% SALT 0.2g / 0.4% <small>of your reference intake. Typical energy values per 100g: 2058kJ/493kcal</small></p>		 <p>NUTRI-SCORE A B C D E</p>

FRONT OF PACK NUTRITION LABELLING: CONTEXT

AGRICULTURE AND FISHERIES COUNCIL

- December 2020, last meeting under the German Presidency of the Council of the EU: **Ministers generally agreed** on the importance of an EU harmonised FOPNL **BUT NO CONSENSUS** for the text prepared by the Presidency.
- Italy, Greece and the Czech Republic voted against
- The Presidency issued the text as **Presidency conclusions**.

Conclusions of the German Presidency on FOPNL: REQUESTS the Commission [...]

- *to base the legislative proposal on an evidence and science-based ex-ante impact assessment*
- *to explore where relevant **the necessity to apply specific conditions to and exemptions** for certain food categories or foodstuffs such as those covered by PDO, PGI, TSG, as well as and single ingredient products.*

FOPNL – AREPO POSITION

AREPO welcomes the commitment of the Commission to analyse different policy options in order to assess which one is the best, since **it would be highly risky to concentrate only on Nutriscore:**

1. Any colour-coded system oversimplifies the nutritional information of a product, especially with regard to GIs

- With the exception of fruit and vegetables, Geographical Indications and some single ingredient products praised for their nutritional value as part of a balanced diet, **may be disadvantaged by an oversimplified nutrition presentation;**
- This system awards a score to food on the basis of an **algorithm which assesses the content of sugars, salt, saturated fats and calories**, while ignoring nutrient groups with a significant positive effect on human health, such as the content of vitamins, minerals and probiotics, usually highly recommended in the context of a healthy diet.

FOPNL – AREPO POSITION

2. Nutriscore does not take into account the level of processing of a product

- It neglects the content of preservatives and additives, artificial sweeteners or any trans fats, meaning that, in its evaluation, some ultra-processed and industrial food might perform better than traditional and very little processed products, like GIs

3. Reformulation ≠ Nutritional improvement

- Due to their composition and traditional characteristics detailed in the product specification, **reformulation is seldom possible for GIs**. Their nutrient profiles and production techniques cannot be altered **without changing the very nature of the product**
- Nutriscore might be source of discrimination and **might contradict the provisions of Article 35, section 1, letter f, of Regulation 1169/2011, which states that additional forms of expression and presentation of the nutrition declaration shall be objective and non-discriminatory**

FOPNL – AREPO POSITION

- The intention of the Commission to stimulate **product reformulation and to set up nutrient profiles to restrict the promotion** (via nutrition or health claims) of foods high in fat, sugars and salt could represent a serious threat for GlS if they are not considered as an exception to this process. **These actions should be limited to industrial products.**

4. Nutriscore provides limited information on nutritional balance

- It does not take into account the **dietary intake**, nor the **daily balanced diet**, nor the notion of **pleasure food** (hedonistic dimension of food, combining quality with taste and pleasure)
- It assigns points **based on the nutritional composition per 100 g or 100 ml of the product**. As a result, certain foodstuffs, e.g. festive products, will be rated as bad **not considering the low frequency and low quantity of consumption**
- The visual bias of **perceiving certain food as healthy**, might lead to **underestimating quantity and energy content**, indulging in excessive intake of food or large portion sizes

FOPNL – AREPO POSITION

PROPOSALS TO IMPROVE THE CURRENT NUTRISCORE SYSTEM

To modify the algorithm at the basis of Nutriscore

Anchored to science-based criteria capable to assess all important nutritional components for each food category

***De facto* classification for PDO/PGIs, some traditional and single-ingredient products**

e.g. the International Olive Oil Council proposed the classification of olive oil in category A (green)

To assess, where appropriate, the need to apply specific conditions and exemptions for certain categories of foodstuffs or certain foodstuffs

Particularly those under EU quality schemes (PDO, PGI, STG) and some single-ingredient products.

FOPNL – AREPO POSITION

- **Smart digital labelling:** It might help including various elements in the overall evaluation of a product, providing consumers a comprehensive understanding of a GI and its impact in terms of both health and sustainability, making easier for GI producers to emphasise all this information in accordance with labelling rules

IF NUTRISCORE WILL BE MADE MANDATORY AND APPLICABLE TO EU GIs

AREPO calls upon the Commission to establish alternative ways of communicating the high quality of these products to consumers, eventually considering how to engage producers and consortia in this process:

- To keep allocating a **sizeable budget to Promotion of EU Quality Schemes;**
- **To increase scientific research on GI and nutrition profile, encouraging the publication of data and results;**
- **To better involve producers, encouraging them to provide comprehensive information on their products and how they are linked to the origin.**

FOPNL – AREPO POSITION

- AREPO supports EU Commission intention to empower EU citizens and consumers to adopt more sustainable and healthier behaviours. However, **FOPNL cannot alone engender such an ambitious long-term change.**
- Fighting off unbalanced nutrition **requires nutrition education** in order to increase consumers understanding and use of information eventually provided with nutrition labelling
- **More education and better communication on the importance of a diversified and balanced diet and how EU GIs and quality products can contribute to it**
- *“Eating less but better”*: reintroducing the notion of **portion** and **daily intake**, combined with the adoption of a **more active lifestyle**
- **Dietary diversity**, encompassing different categories of food, tastes, seasonality, freshness, culture and skills
- **Many GIs are associated with specific diets recognized for their interest in terms of nutrition**, e.g. the Mediterranean diet.



Thank you for your attention!

Francesca Alampi

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