

Front-of-pack nutrition labelling (FOPNL) Systems

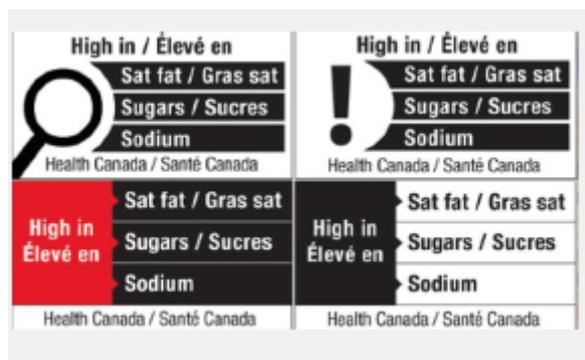
Summary of the IDF Webinars on Front-of-Pack Nutrition Labelling systems in France, the EU, Canada and Australia/New Zealand.

Nutri-Score and EU developments - Webinar IDF, 9.7.2020

Developments in Canada

Speaker: Matt Morrison, Dairy Farmers of Canada, Assistant director, government relations & regulatory affairs.

A revision of the Canadian dietary guidelines is underway. Restrictions of advertisement to children will be introduced. Warning symbols, e.g. high in sodium (if more than 15% of daily intake) also are planned. More than 50% of the products which will carry a planned label, will be dairy products if the system is not changed. Three nutrients are targeted: salt, sugar and saturated fat.



Dairy Farmers of Canada focuses their messaging on educating senators on nutrition knowledge to fight for exceptions for dairy products. They were not very successful working with Health Canada. To improve neutrality of Health Canada, interactions with stakeholders were restricted. Through the work with senators, they were able to slow down the process of introduction; there is good progress. The elections in 2019 slowed down the process. After the elections, Health Canada resumed the FOPNL system topic.

“We are optimistic”, Matt Morrison says: The 98% of supporters have dropped to a lower number. They are optimistic that they can get exceptions for dairy products. They could convince senators and partly Health Canada e.g. with the science that saturated fat from dairy has no negative nutritional effect and that dairy saturated fat has to be treated differently from other saturated fat.

Nutri-Score in France

Speaker: Melanie Grivier – France, Technical, scientific and regulatory affairs, ATLA

The talk is about the French FOPNL system. ATLA is the Association representing the French dairy processors. It has three departments: regulatory, technical, economic.

The Nutri-Score key elements are:

- To enable consumer to evaluate the contribution of a food product to a healthy balanced diet with regards to its nutritional composition.
- To enable comparing within the same category to encourage consumers to choose a healthier option.



It is a voluntary system. An uncertainty about its legal basis exists. The EU regulation 1169/2011 about information to consumers, article 35 or article 36 and another EU regulation are taken as the basis. The regulation of 2011 allows countries to have country specific nutrition labelling. FOPNL was not an issue then. The Nutri-Score system was tested in 2016 in a real life situation to evaluate the system. Four systems were compared, including the British traffic light system and others. They were tested in 60 supermarkets during 10 weeks in some food groups. A report was published about the field test and its scientific evaluation, and recently also a peer-reviewed publication about the study: Egnell M, Ducrot P, Touvier M, Allès B, Hercberg S, Kesse-Guyot E, et al. (2018). Objective understanding of Nutri-Score Front-Of-Package nutrition label according to individual characteristics of subjects: Comparisons with other format labels. PLoS ONE 13(8): e0202095. <https://doi.org/10.1371/journal.pone.0202095>

Nutri-Score came out best, it improved the nutritional quality of the basket of labelled foods purchased by 2.5%. In 2017 the Nutri-Score system was published and officially recommended. By now, 30% of the market products have it on the packaging. More than 350 processors, and many supermarket chains are participating. Nutri-Score extends to other European countries, such as Spain, Belgium, Germany, Switzerland, Luxembourg, may be The Netherlands. There is a fast increase of its use also on e-commerce.

How does Nutri-Score work?

In a first step, points for nutrients to discourage (negative N) and for nutrients to encourage (positive P) are calculated:

- Negative points calculation, energy, Saturated fat, sugars, sodium (max. 4 x 10 points)
- Positive points calculation: fruits, vegetables, pulses, nuts, rapeseed, walnut and olive oil (%) (F&V); fibres; proteins (max. 3 x 5 points for food (without beverages))

In a second step, it is decided if the positive points of proteins are taken into account or not. This depends on the total of negative points and on the points for F&V:

- if $N < 11 \rightarrow N - P$
- if $N \geq 11 \rightarrow$ if $F \& V \geq 5$ (for food), then $N - P$; if $F \& V < 5$ (for food), then $N - (Fibre + F \& V)$ (this means if N is high, protein can't create positive points, but cheese is an exception, the positive points of proteins are counted).

For the four categories general food, beverages, cheese or fats/oils/butter, the calculation is differentiated as partly seen in the examples given.

How does Nutri-Score work for cheese and milk products?

For cheese the score is always N – P (excluding quark). The protein positive points are taken into account even if the negative points are above 11, but only up to 5 points (maximum for protein content from 8 g protein /100 g and higher).

Milk is not considered as a beverage, drinkable yoghurt and flavoured milks containing more than 80% milk not either, and some other exceptions exist. This is an advantage for these dairy products.

For cheeses, positive is protein, negative are salt and saturated fat. Full fat milk is B, semi skimmed milk is A or B. Plain yoghurt is A or B, fruit yoghurt C. 85% of cheeses are D, some E (e.g. Roquefort). A few cheeses are C. Fresh dairy are 15% A, 19% B, 49% C, and 16% D. Butter gets an E.

Our strategy to improve the Nutri-Score for dairy products

The main problem for dairy products is the low scoring of cheese with 85% of cheeses getting a D. The goal of the dietary guidelines for sufficient consumption of dairy is compromised. Therefore, the system has to be improved especially for cheese. We try to focus on the cheese question.

- Some cheeses are more favourable than others, but this can't be seen in the score, ranking of cheese is independent of the nutritional quality of a cheese. (e.g. a cheese with 2% salt gets the same Nutri-Score as a cheese with 0.6% salt, and fat content of cheese mostly does not influence the Nutri-Score).

Our reasoning is that cheese is important as a calcium provider. Protein and calcium correlate with each other. We suggested the following improvements:

- Increase the protein points, not stop at 5 points,
- This suggestion would increase cheeses to C, some to A or B
- We suggested another improvement so that low salt would get more points

The reasoning with the better nutritional quality of dairy saturated fat compared to other saturated fat is not judged as successful because in food labelling no difference is made for saturated dairy fat compared to other sources. The strategy of ATLA is to influence politicians and NGOs, and to work with EDA (European Dairy Association), other dairy associations, and to focus on the cheese category.

The retailers give us a hard time; they put the Nutri-Score on their online shops, and use it for promotions. The use on digital tools and mobile apps is widespread too. In the future, an advertisement ban to children for D and E might be introduced.

Developments on FOPNL systems on the EU level

Speaker: Kinga Adamaszwili, EDA (European Dairy Association), Senior Nutrition, Health & Food law Officer.

Kinga is of Polish origin, and has a broad experience at EU level, at WHO Europe in Copenhagen, in Poland, in Ireland, with EFSA (Italy) and other places. She has a very international European professional background. This is the comment of the moderator of the webinar, Matt Morrison from Canada.

What is the work and the position of EDA on FOPNL?

EDA works on the EU developments. The general positioning of EDA is that FOPNL should be in line with the national dietary guidelines. A FOPNL system always needs to be based on sound science, and it has to be voluntary, and harmonized across the EU. EDA does not recommend any existing scheme because they all lack something, and dairy products are not judged fairly. E.g. the Nuri-Score is not judging cheese justly; therefore, EDA does not support it but is against this system in its present form.

The EU commission would like to introduce a mandatory FOPNL system.

The new EU commission is working on the “EU Green Deal”, how to make Europe the 1st climate neutral continent by 2050. The EU Green Deal aims for healthy affordable sustainable foods, including guidance with a FOPNL, biodiversity, fair economic return for farmers, organic farming increase, to protect the environment, and to increase biodiversity. This makes things very complex. A FOPNL system and sustainable healthy diets are priorities of the EU commission for the food sector. A harmonized mandatory FOPNL proposal should be ready by 2022. The commission also intends to introduce Nutrient Profiles to restrict advertisement for foods.

The EU Commission report on FOPNL

The EU Commission report on FOPNL was published on 20th May 2020.

(<https://ec.europa.eu/jrc/en/publication/eur-scientific-and-technical-research-reports/front-pack-nutrition-labelling-schemes-comprehensive-review>). It gives a useful overview of existing systems inside and outside of the EU with details. The regulation 1169/2011 does not harmonise food labelling. At the time then, there was no FONPL scheme applied or discussed. Each country could develop its own scheme. Because of this, there are many schemes present in the EU market nowadays. Things for a common policy were postponed and postponed. Finally, this May 2020, the report was published. It includes the existing schemes, addresses positions of member states and the industry, gives the view of the joint research centre, and of various consumer organisations and NGOs. Six schemes developed by the public sector, e.g. the keyhole, nutri-score, the Finnish heart symbol, the British traffic light system, the Italian NutrInform battery system, and private systems e.g. healthy choices or the evolved nutrition label (ENL) are included.

The commission sees a FOPNL system as a good tool to promote healthy nutrition. They see potential that consumers can make more healthy food choices based on a FOPNL scheme. The commission also recognised that the use of different schemes in different countries leads to confusion, increased costs, and loss of trust. Harmonization is necessary and mandatory labelling is intended.

In the eyes of EDA, things can be dangerous for some products e.g. dairy. A next step will be that EFSA will give a scientific opinion on FOPNL.

Questions after the two presentations:

- Semi-Skimmed milk should get an A, we will work on that (Mélanie)
- As the Nutri-Score labelling is available on apps, even if it is not on the pack, it is available, it might not be accurate though on the apps.
- By 2022 there will be a legal proposal on the table by the EU Commission, but restrictions of certain nutrition and health claims are an issue as well. An example on the market is where unhealthy products such as candies use nutrition claims e.g. candies with vitamins. The commission wants to avoid this.
- FOPNL will not include sustainability. In the wider context sustainability will play an important role.

- Nutri-Score works pretty well for fresh dairy products, but for cheese it is not favourable (Kinga). The problem is the focus on the three nutrients saturated fat, salt and sugar. This is similar in Canada.
- Will Nutri-Score include more good nutrients in the future? Calcium for instance? Mélanie: Calcium is not mandatory for labelling in Europe, therefore we did not focus on this because chances to recognise calcium are seen as low. There is a group of the countries that apply Nutri-Score to revise the system, but Mélanie does not know what is going on there.

The Health Star Rating (HSR) system in Australia and New Zealand - Webinar IDF, 9.6.2020

Speakers of this webinar on 9th June were Melissa Cameron, Human Health and Nutrition Policy Manager, Dairy Australia; and Deanna Mark, Nutrition & Regulatory Strategist, Fonterra Australia.



The health star rating was launched in 2014. It includes energy, saturated fat, sodium, sugars, fruit & vegetables & nuts & legumes (FVNL), and in certain situations fibre and protein. Calcium is used in the system to distinguish dairy products from other foods, but is not used as part of the calculation itself. There are six HSR categories

- 1: Beverages other than dairy
- 1D: Dairy beverages: Milk and dairy based beverages, and plant-based alternatives
- 2: All foods other than those included in category 1, 1D, 2D, 3 or 3D.
- 2D: Dairy foods: yoghurts and soft cheeses
- 3: Oils and spreads
- 3D: Cheese and processed cheese (with calcium content > 320 mg/100 g)

The main goal is the comparison in the same food group. Now more and more, the HSR logo is reduced to the star logo, without the individual nutrients.

The core dairy foods score as follows:

- Whole milk is 4 stars
- To take fat out is an advantage at the moment
- Chocolate mousse scored better than yoghurt

Now, a five-year review is ongoing. It is a government led system, and therefore limited on funding. The pros and cons are:

- Combined single star rating is good for dairy (not individual nutrients), this is positive
- That it is a voluntary system is good
- Dairy Australia and Fonterra talk with key opinion leaders. They make proposals, and talk with them at an early stage.
- They have a consistent and united voice within the dairy industry / sector
- The goal is that core dairy foods are at least 3 stars

At the beginning, all cheeses scored half a star, now it is much better. They work with the evidence in science, with the dairy matrix. It is like turning the Titanic. Food dietary guidelines

and the HSR are often not compatible. The recommendation of IDF and Melissa Cameron as working on FOPNL in Australia /New Zealand and within the IDF is to utilize the papers established by IDF to talk with authorities in your own country and with Codex people in your country.

Dairy does bad because saturated fat scores bad and no exception is made for dairy. Here, Dairy Australia is working to convince authorities to change that. Sometimes, full fat plain yoghurt has a lower score than dairy desserts like chocolate mousse.

Supplementary information: The IDF documents on the nutritional value of dairy foods are the following:

- [“Health benefits of Dairy”](#) (IDF Fact sheet 006/2019),
- [“Is there real evidence for a link between milk and mortality?”](#) (IDF Fact sheet 005/2019),
- [“Matrix: The importance of the dairy \(food\) matrix in the evaluation of the nutritional quality and health effects of food”](#) (IDF Fact sheet 003/2019) and
- [“Trans fatty acids \(TFA\) to be differentiated into industrially produced TFAs and naturally present TFAs”](#) (IDF Fact sheet 003/2018)

In the “health benefits of dairy” fact sheet, there is a lot about milk fat and its nutrition-health aspects. The “Is there real evidence for ...” fact sheet also talks about milk fat and some bioactive components. The fact sheet on TFA gives some of the bioactive TFA in milk.

Liebefeld, 10th July 2020, Walter Bisig