

## IMACE POSITION ON FRONT PACK LABELLING

### Overview of Front of Pack Labelling (FOP)

Regulation (EU) No 1169/2011 on the provision of food information to consumers (FIC) requires the Commission to adopt a report on the use of additional forms of expression and presentation of the nutrition declaration, their effect on the internal market, and the advisability of further harmonisation in this field. The adoption of this report, foreseen in the FIC Regulation by 2017, has been postponed to the end of 2018 with a view to include the experience with recently introduced/developed front-of-pack (FOP) nutrition labelling schemes.

A front-of-pack labelling scheme is meant to help the consumer to make a healthier choice at the purchase level, push the producers to reformulate the products for a health benefit for all and at the same time help the healthcare professionals for their nutritional counselling. Helping consumers to make healthier food choices is considered as a key lever of public health policies to improve nutritional status of individuals and prevent chronic diseases.

In Europe, several systems have been developed with most relevant: a. the UK Food Standards Agency (FSA) traffic light scheme (2011); b. the FR - Nutri-Score Labelling (2017); and c. the keyhole symbol that is being used in Sweden, Denmark and Norway (first in Sweden since 1989) to identify healthier options.

### 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 properties / characteristics of its products (on top of and in addition to the mandatory nutritional information pursuant to Regulation (EU) No 1169/2011 ), as well as providing additional interpretation/explanation of the (mandatory) nutritional information at the time of purchase (i.e. RI per 100 g and / or per portion/serving).

IMACE believes certain consideration should be taken into account when developing a FOP scheme. These include:

- In accordance with transparent and objective criteria based on robust and sound scientific evidence (science based);
- Criteria should be set by an independent scientific expert group;
- Non-discriminatory;
- Voluntary (not mandatory);
- Whether the product is a complex or single nutrient/food and the place it has in an overall healthy dietary pattern;
- Take into account the total nutritional value and thus also other nutrients (vitamins, minerals, omega 3 fatty acids, MUFA, PUFA, DHA/EPA, etc.);
- The amount of the product expected to be consumed at daily basis (not per 100 g or 100 ml) taking into account the RI daily portion and serving at moment of consumption;
- The FOP labelling shall not mislead the consumer to make choices that are against current nutritional recommendations from health organisations and national authorities (consistent with current nutritional recommendations from health organisations and national authorities);
- The system shall have broad support from the industry, health professionals, consumer organizations, retailers and government;
- Develop a harmonised scheme across the EU.

Moreover, it shall be considered carefully that as margarine\*, is mostly a food product that consist of mainly one nutrient, if systems such as the UK traffic light or the French Nutrient-Score systems were to be applied, it would be **highly discriminated**.

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

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