EUROPEAN MARGARINE ASSOCIATION

IMACE POSITION ON FRONT PACK LABELLING

Brussels, October 2019

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.

It seems that the French Nutri-Score labelling is getting most traction as several countries (Spain, France, Belgium, Portugal and recently also Germany) and big brands like Nestlé and Danone and several retail brands adopted this voluntary labelling.

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 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 discriminative**.

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[1].

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

EUROPEAN MARGARINE ASSOCIATION

FRONT-OF-PACK NUTRITION LABELLING IN EUROPE: IMPACT ON PLANT-BASED FATS

Front-of-pack labelling schemes – commonly referred to as nutrient profiles – are designed to educate consumers and empower them to make informed choices to foster healthier diets. IMACE is supportive of such objectives. However, schemes implemented up to now offer too simplistic nutrition labelling and ultimately contribute to misleading and miseducating consumers. The case of plant-based fats testifies of that.

This Annex measures the impact of the three main nutrient profiling schemes used in Europe on margarine and how spreads are categorised:

- The 'Traffic Light' system, used in the UK: The system measures four key ingredients (total fats, saturated fats, sugar, salt) against the daily Recommended Intake (RI) set out in Regulation (EU) 1169/2011, Annex XIII, Part B – all expressed in grams. Depending on their level in the food product, these elements will be ranked using the following colour codes: green (low), amber (medium) and red (high). *The greener the nutrients, the healthier the product*;
- The 'NutriScore' scheme, applied in France, Belgium, Spain, Portugal and recently also in Germany. The scheme makes use of two different tables: the first (Table A) takes into account the levels of energy (kJ), sugars (g), saturated fats/total fat ratio (%) – specific for fat products, and sodium (mg). The second (Table B) assesses the percentage of fruits, vegetables and some vegetable oils rich in vitamins (e.g. walnut, nut, rapeseed and olive), as well as the content of fibres and proteins (g). All nutrients tables are ranked from 1 to 10: the higher the number, the higher the content or percentage of the nutrient in the product. In Table A, that means that the higher the number, the more unhealthy the product; for Table B, the higher the number, the healthier the product. The points of the different nutrients are summed up and then associated to a specific letter - from A to E - with a specific colour – from green to red. *The nutrients are therefore merged*

together and expressed under a unique value, represented by a letter and a colour, where A (dark green) = extremely healthy and E(red) = extremely unhealthy;

- The 'Keyhole' labelling, implemented in Sweden, Denmark, Norway, Lithuania, Iceland and Macedonia. The labelling assesses the nutritional value of 33 food products, setting tailored criteria that specific products must satisfy to be able to use the label in the packaging. In the case of fat spreads and blends, benchmarks are established on the maximum level of fat content (g), saturated fats/total fat ratio (%) and salt content (g). *The products allowed to use the label (green or black keyhole) meet the criteria to be qualified as healthy.*

The products examined represent four plant-based fat products according to their fat content (from 25 to 90%). The variety of composition gives a wider view on how those products are ranked on the different schemes. Based on the reference standard, qualifying and disqualifying nutritional aspects and benchmark set, the ranking systems give interesting insights which will be taken up in the final remarks.

The same assessment is subsequently done for butter, displaying how the main animal-based alternative to margarine performs under the aforementioned schemes. Emphasis will be put on the differences between animal and plant-based fats and on the reasons why such differences occur.

Performance of plant-based fat products

25% Fat content

Traffic Light (UK)	NutriScore (France, Belgium, Spain, Portugal, Germany)	Keyhole (Sweden, Denmark, Norway, Iceland, Lithuania, Macedonia)
HIGH Fats MED Saturates LOW Sugar LOW Salt	NUTRI-SCORE A B C D E	®

59% Fat content

Traffic Light (UK)	NutriScore (France, Belgium, Spain, Portugal, Germany)	Keyhole (Sweden, Denmark, Norway, Iceland, Lithuania, Macedonia)
HIGH Fats HIGH Saturates LOW Sugar MED Salt	NUTRI-SCORE A B C D E	®

70% Fat content

Traffic Light (UK)	NutriScore (France, Belgium, Spain, Portugal, Germany)	Keyhole (Sweden, Denmark, Norway, Iceland, Lithuania, Macedonia)
HIGH Fats HIGH Saturates LOW Sugar MED Salt	NUTRI-SCORE A B C D E	®

90% Fat content

Traffic Light (UK)	NutriScore (France, Belgium, Spain, Portugal, Germany)	Keyhole (Sweden, Denmark, Norway, Iceland, Lithuania, Macedonia)
HIGH Fats HIGH Saturates	NUTRI-SCORE A B C D E	Not allowed for this product, as it doesn't meet the 'maximum total fat content' criterion

Conclusions

Overall remarks

- Plant-based fat products perform best when assessed on the basis of *voluntary*, *positive* and *tailored* labelling schemes. This is the case of the 'Keyhole' scheme, which promotes healthy products according to specific benchmarks that are tailored to each food product group. In case the product does not satisfy all the criteria, the label is not applied. In the examples proposed, 3 out of 4 products would receive the Keyhole label.
- Plant-based fat products are highly discriminated against through labelling schemes with strict benchmarks on the overall fat content, such as the 'Traffic Light' system, or on the overall calories, such as in the 'NutriScore'. When comparing the performance of the products on the 'Traffic Light' and 'NutriScore', only products with 25% of fat content scores fairly well.

Therefore:

- A tailored labelling scheme ('Keyhole') is able to better capture the nutritional value of plant-based fats and to assess their quality.
- A more general labelling scheme expressed under a unique value ('NutriScore') does not truly depict the nutritional value of plant-based fats, due to an unbalance between the 'negative' and 'positive' components. The combination of letters and colour code further contributes to convey a negative image of margarine. The 'positive' components of certain margarines and spreads - unsaturated fatty acids and vitamins - are not taken into account as 'positive' components in the Nutriscore calculation to improve the overall score. This results in a score which is in contradiction with several national dietary guidelines where oils and margarine/spreads are recommended as the healthier fat source.
- A general labelling system that displays each nutrient separately and through colour codes ('Traffic Light') negatively affects margarine and spreads, since it explicitly emphasises the high total fat content. This further misleads consumers and strengthens the common stereotype according to which 'all fats are bad'.

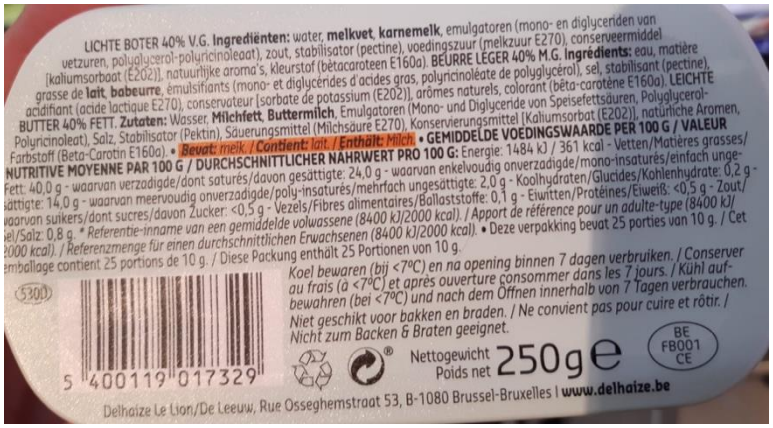
Remarks on fat content

- As margarine is mainly composed of fat, focusing on the total fat content does not acknowledge the *variety* of fats contained in the product, which is rich in mono and poly-saturated fats, as well as Omega 3 and 6 fatty acids.
- While the presence of good fats is clearly reported in the nutritional table, it does not show in the nutritional labelling schemes. As such, plant-based fats could be ranked in the same way as other fat-rich products which are not as nutritionally rich.

- The impact of such labelling would be worse if the products ranking low on such schemes would not be allowed to bear nutrition or health claims, such as 'Low in cholesterol', 'Lactose-free', 'rich in Omega 3'.
- A more realistic nutrition labelling scheme should therefore also assess the presence of other types of fats as 'positive nutrients', just as the protein and fibre content is positively taken into account in the 'NutriScore'. Lastly, the role of margarine and spreads in the overall diet and on health should be taken into account upon assessing their effective nutritional value.

Performance of animal-based alternatives to margarine and spreads (butter)

40% fat content



Traffic Light (UK)	NutriScore (France, Belgium, Spain, Portugal, Germany)	Keyhole (Sweden, Denmark, Norway, Iceland, Lithuania, Macedonia)
HIGH Fats HIGH Saturates LOW Sugar MED Salt	NUTRI-SCORE A B C D E	Not allowed for this product, as it doesn't meet the 'maximum saturated fat/total fat content' criterion

82% fat content

Traffic Light (UK)	NutriScore (France, Belgium, Spain, Portugal, Germany)	Keyhole (Sweden, Denmark, Norway, Iceland, Lithuania, Macedonia)
HIGH Fats HIGH Saturates LOW Sugar LOW Salt	NUTRI-SCORE A B C D E	Not allowed for this product, as it doesn't meet the 'maximum total fat content' and the 'maximum saturated fat/total fat content' criteria

Plant-based fat vs butter

- Regardless of the nutrient profiling scheme applied, butter is negatively affected by its high saturated fat content. Even in the case of 'light' products – as in the first example proposed - the 'saturated fat/total fat' ratio is above 60%. This percentage exceeds the benchmark values established under all three schemes, including the most tailored one ('Keyhole').
- Consequently, the total fat content being equal, plant-based fats score better than butter because of the lower content in saturated fats. In plant-based fats with a high fat content – such as the 90%-fat margarine example provided - the 'saturated fat/total fat' ratio stays relatively low – 20% in the example proposed.
- Animal-based products such as butter cannot claim to contain a remarkable percentage of 'good fats', unlike plant-based products. This is visible in butter's nutritional tables, where the quantity of mono and polyunsaturated fats is relatively low or not even mentioned.