

IMACE POSITION ON EU NUTRIENT PROFILES

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The European Commission recently published its Farm to Fork Strategy, stating its commitment to achieving sustainable food systems in the EU, from production to consumption through processing. As part of this mission, it is expected to set nutrient profiles at EU level by the end of 2022. Nutrient profiles are meant as a tool to categorize foods following their nutritional composition. Such tool could be used to help consumers make healthy food choices, to foster food reformulation and to regulate marketing practices.

IMACE welcomes the ambition of the European Commission to act on sustainable and healthy diets. The margarine and spreadable fats sector also fully endorses the intentions underlying nutrient profiles, i.e. to educate consumers about nutrition and empower better informed choices. To be effective and avoid misguiding consumers, it is crucial that EU-wide nutrient profiles reveal the **full nutritional value** of foods, especially for mono-ingredient products such as margarine and spreadable fats.

Nutrient profiles and fats

Nutrient profiles are also intended to avoid abusive marketing practices, especially in the form of nutrition and health claims (as per Regulation (EC) 1924/2006¹), on products with a high content in 'negative' nutrients. The latter typically encompass fats, sugars, and salt, a.o. While this objective is essential, any labelling scheme should take into account the specificities of mono-ingredient products.

Margarine and plant-based spreadable fats are emulsions of vegetable oils and water and mainly consist of one nutrient: fats. Yet, they are often rich in **good fats** (e.g, omega-3 fatty acids, unsaturated fats, DHA/EPA). Claims such as 'rich in Omega-3' and 'rich in unsaturated fats' are authorised in the EU and have received positive opinions from the European Food Safety Authority (EFSA).

¹ Regulation (EC) No 1924/2006 on nutrition and health claims made on foods: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02006R1924-20141213>

Moreover, margarine and plant-based spreadable fats are recommended in international² and national³ dietary guidelines as a good alternative to butter to reduce saturated fat intake, cholesterol and the risk of cardiovascular diseases.

IMACE's views on EU Nutrient Profiles

EU nutrient profiles should follow key principles to ensure margarine and fats are properly evaluated:

- **Alignment with authorised nutrition and health claims.** Nutrient profiles are intended to complete the EU Nutrition and Health Claims Regulation. It is thus essential that they effectively take into account authorised claims for the EU legislation is to be properly implemented and consistent;
- **Science-based nutritional information.** Nutrient profiles need to show the actual nutritional value of foods based on strong scientific evidence, including guidelines and studies published by international and European bodies, such as the World Health Organisation and EFSA. Any labelling scheme should reflect the content of foods and acknowledge their contribution to specific health or nutrition needs;
- **The food-diet link.** One can hardly categorise foods as *good* or *bad* without paying heed to their place in the overall diet. Margarine and spreadable fats are consumed in small quantities and frequency will vary from one person to another. IMACE thus recommends some flexibility, looking to **portions** instead of 'per 100 g' benchmarks for spreadable fats, to better reflect consumption patterns;
- **Coherent food categories.** Nutrient profiles should help consumers compare the nutritional value of foods within a same category. A category should gather food products with similar functionality and intake frequency from a consumer perspective. For instance, margarine, spreadable fats, oils and butter belong to the same category, as per the Common Market Organisation [Regulation \(EU\) 1308/2013](#).
- **Inclusion of a wide spectrum of nutrients.** Nutrient profiles should assess the total nutritional value of a food product, including positive components such as vitamins, mono- and poly-unsaturated fatty acids.

² WHO '[A healthy diet sustainably produced](#)'.

³ Dutch '[Wheel of Five](#)', Swedish '[Nordic Nutrition Recommendations](#)'.

- **Information about reformulation.** EU Nutrient Profiles are meant to encourage reformulation in view of healthier foods. Therefore, food business operators should be allowed to communicate about their reformulation efforts towards consumers. A coercive system that would prevent any communication for products high in fats – as spreadable fats naturally are – would be discriminatory and lead to a biased perception of plant-based fats.

IMACE considers the above-mentioned adjustments as a good step towards ensuring that the whole nutritional value of vegetable fats and spreads is well-reflected in the upcoming EU nutrient profiles.