

IMACE STATEMENT ON NUTRI-SCORE

Brussels, 20 September 2023

✎ IMACE's views on Front of Pack Labelling

MACE is supportive of initiatives that aim to provide consumers with easy-to-understand and non-misleading information related to the nutritional characteristics of foods, and beyond the mandatory nutrition declaration pursuant to Regulation (EU) No 1169/2011. IMACE, nonetheless, is of the opinion that such information should be in accordance with transparent and objective criteria based on robust and sound scientific evidence. IMACE endorses the intentions at the basis front-of-pack labelling systems such as the Nutri-Score, i.e., to educate consumers about nutrition and empower better informed choices for healthy diets.

However, the current Nutri-Score algorithm is not fully in line with the scientific evidence and the national recommendations in many EU Member States regarding the health and nutritional benefits and dietary recommendations for the margarine and spread category.

The overall nutritional recommendations in Europe (WHO guidelines, EFSA opinions, etc.) advice to replace the saturated fatty acids in the diet by unsaturated fatty acids (mainly poly-unsaturated fatty acids). Furthermore, a sufficient intake of the essential fatty acids is recommended. The outcome of the Nutri-Score algorithm should reflect the nutritional recommendations on fats to guide the consumer towards the healthiest choices.

✎ IMACE proposes the following amendments

- **Include seeds, nuts and kernels within the “fruit and vegetables” category:**

The report recommends assigning positive points to products containing a certain percentage of oils derived from fruit and vegetables, which are able to get a high score (e.g. extra virgin olive oil). However, seeds and nuts are also an important source of unsaturated fatty acids (including essential fatty acids), protein, dietary fibre, vitamins and minerals (e.g. calcium, magnesium, iron, zinc)¹. This also applies to their derived oils. There is therefore a strong scientific basis to include them within the (expanded) category of “fruit, vegetables, nuts and

¹ [Scientific advice related to nutrient profiling for the development of harmonised mandatory front-of-pack nutrition labelling and the setting of nutrient profiles for restricting nutrition and health claims on foods](#), EFSA, April 2022

seeds”, allowing low-fat margarine and plant-based spreads (up to 25% fat) to receive a favourable score.

- **Assess product categories taking into account the entire score values from A to E:**

This would allow consumers to understand which are the healthiest products within the same category (e.g. spreadable fats). The category “fats, oils, nuts and seeds” is extremely heterogenous, and not all products can be used interchangeably by consumers: for instance, oil cannot always be used in the same way as spreadable fats. The proposed algorithm therefore still makes it difficult for consumers to identify the healthiest option within a category whose products perform the same function, such as plant- and animal-based fats for spreading and baking.

This is because consumers focus on the single colour code and letter: if the majority of margarines score “C” they would still come across as “not so healthy” even if in reality they represent the healthiest choice within their group. Ensuring a representation of all the scores (from A to E) would support consumers’ education and lead to more conscious food choices.

Additionally, in terms of choice for healthier products, margarines have long been fortified with vitamin D making a substantial contribution to the vitamin D intake. As per the Nutri-Score algorithm, consumers are more likely to opt for other products, which could reduce the intake of vitamin D within the population. This while there are already many groups in society that have a low vitamin D intake.

- **Assess single-use ingredient products (e.g., fat products) on a portion-based approach:**

Applying the reference value of 100 g does not lead to a truthful evaluation of the nutritional value of fat products within the overall diet, since consumption of these products is generally limited to a very low amount/day (10 g/day). The algorithm should take this into consideration when allocating (negative) points to fat products.

Should they become implemented, the three proposals would help align the Nutri-Score algorithm with national dietary guidelines. IMACE remains at disposal to support the ScC with additional input and/or to explain more in detail the proposals.
