

IMACE REACTION TO THE REPORT 'UPDATE OF NUTRI-SCORE' BY SCIENTIFIC COMMITTEE OF THE COUNTRIES OFFICIALLY ENGAGED IN NUTRI-SCORE

14 October 2022

IMACE welcomes the report of the Scientific Committee of the Countries Officially Engaged in Nutri-Score (ScC), and supports the need to update the Nutri-Score algorithm, in line with dietary guidelines, as well as the EU health and sustainability goals set forth in the EU Farm to Fork Strategy.

The report represents a step forward in comparison to the current Nutri-Score calculation method, especially in relation to:

- The development of a dedicated category encompassing “fats, oils, nuts and seeds”;
- The creation of a dedicated criteria “Energy from saturates” to replace the current one on “Total energy”. This is in line with the recommendations on decreasing the amount of saturated fats (SAFA) – whose excessive consumption is associated with increased risk of coronary heart disease and related mortality¹ – instead of looking at fats from a purely quantitative perspective: in fact, evidence shows that many populations still fail to reach dietary guidelines with respect to fatty acid intake, and acting on the amount and type of fat can have a big impact on overall health².

However, by applying the updated algorithm, the majority of margarines and spreads would still score C and D, with few products being able to score B, and none A. This is not aligned with national dietary guidelines of countries implementing the Nutri-Score – e.g. the Dutch Wheel of Five³, the Flemish Food Triangle⁴, the French Manger Bouger⁵, the Swiss Food Pyramid⁶ – which recommend consumption of sources of unsaturated fatty acids, such as (liquid and soft) margarine.

¹ [Guidelines: Saturated fatty acid and trans-fatty acid intake for adults and children](#)

² Patel, A. R., Lecerf, J. M., Schenker, S., & Dewettinck, K. (2016). The contribution of modern margarine and fat spreads to dietary fat intake. *Comprehensive reviews in food science and food safety*, 15(3), 633-645.

³ [Dutch Wheel of Five](#)

⁴ [Flemish Food Triangle](#)

⁵ [Programme National Nutrition Santé 2019-2023](#)

⁶ [Swiss Food Pyramid](#)

Against this background, IMACE would like to propose 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)⁷. 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 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,** allowing 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.
- **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.

⁷ [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

If 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.