

EMPOWERING CONSUMERS

FoP LABELLING REFORM: HEALTH, KNOWLEDGE, LIBERTIES

Wednesday 12 October, European Parliament, Brussels

Proposals and actions related to the revision of Reg(EC) No 1169/2011, for a harmonized mandatory front-of-pack nutrition labeling system at Eu level.

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Athens Chamber of Small and Medium Industries, (acmi), representing some hundreds of food production and supply businesses, has actively participated in the European and national dialogue for the new food labeling system, announced by Eu Authorities since the last 2 years. Acsmi has organized a large forum of 17 partners, representing Associations, Chambers and other professional bodies of food operators, food producers, food exporters as well as consumers' organizations and nutrition-public health experts, under the title of “**Initiative for an effective-based on nutritional education – food labeling system**”. In this context, Greek collaborative initiative has published an analytic discussion paper on food labelling systems, which was also sent to the EC (DG for Health and Food Safety), aiming to motivate national and Eu Authorities for the adoption of a fair, informative and harmonized system, without national derogations and food products' discrimination.

We have also contributed to EFSA's public consultation on Scientific Opinion for “setting nutrient profiles and restricting nutrition and health claims on foods”, considering that **any labelling system should be part of a broader nutritional strategy and Public health policy and suggesting that** health outcomes are strongly related with dietary habits, nutritional preferences and traditional customs of different ways of cooking or food processing. So, any food product's evaluation, stated on a label, should take in account the “position” of the relevant food in the daily diet, as well as its usual consumption in relation to other nutrients, that could differentiate its positive or harmful impact on health. **In any case, food choices are principally related to consumers' appropriate information and nutritional education, that should be enforced by European and national Authorities and could not be replaced by any labels' scheme or content.** That is one of the main reasons for our opposition to the over simplified proposals, like Nutriscore, that could mislead consumers' choices, discriminate against many traditional food products and diets and only promote food overprocessing and reformulation.

Actually, according to the current Eu legislation, there are 3 different forms of labelling on food packaging, giving plenty of nutritional informations to consumers, like the mandatory “nutrition declaration”, (under the Eu Reg. 1169/2011), usually on the back of the package, the optional nutritional and health claims, (according to the Eu Reg. 1924/2006) and the Guidelines of Daily Amounts (GDAs), linking the nutritional profile to the serving size and the daily nutritional requirements, (according to the reference values in Annex XIII of the Eu Reg.1169/2011), optional too. The current labelling system, based on a very extended, detailed and complicated legislative framework of rules and restrictions, could be revised following a more integrated approach of the nutritional information available for the consumer, by a more coherent, transparent and harmonized labels presentation. In this context our **proposals** are mainly based on the following **principles**:

1. **Any revision of the current legislation**, for a harmonized system, more compatible with hygienic rules and sustainability, should be accompanied by systematic Eu and national campaigns that could offer a broad information and nutritional education for the consumers.
2. **The nutritional labels' identity** should be strengthened and become morphologically more recognisable by the consumer, as the “key element” of nutritional information. For example, to set rules for letters, background and boxes' presentation.
3. **The serving size** should be also defined, by setting general rules, as well as for the integer multiple of the size, to the entire content of the package. Tables with indicative serving sizes by category and type of food should be developed.
4. **Nutritional and health claims** could be maintained, representing considerable information for consumers' choices, under a more simplified legislative framework, scientifically documented and controlled by food authorities.
5. **The daily requirements or Guidelines of Daily Amounts (GDA)** could be established, like a uniform system (“barrels”) on the front of the package.
6. **Nutrition classification systems, with colors**, shapes, letters or numbers could be optional , ruled by a strict control framework, analogous to the nutrition and health claims legislation, preventing consumers' misleading and food products' discrimination.
7. **Retail and small size food businesses** should be assisted to adapt to any new label system established and should be provided by incentives for the use of innovative, digital solutions.