

H.E. Stella KYRIAKIDES  
Commissioner for Health and Food Safety  
European Commission  
Rue de la Loi 200, 1049 Brussels, Belgium

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**Front-Of-Pack Nutrition Labelling: Striking the balance between accurate information and freedom of choice for consumers**

Brussels, 09 November 2022

Dear Commissioner Kyriakides,

As part of the Farm to Fork Strategy, the European Commission has decided that, by the final quarter of 2022, it will present its proposal for a harmonised front-of-pack (FOP) nutrition labelling system, which will be mandatory across all EU countries. The aim is to encourage consumers to shift to healthier and more sustainable diets.

We share this goal, and also agree that a nutritional education method that focuses on a healthy, balanced and environmentally friendly diet is necessary. We also believe that proper nutrition information is fundamental to enabling consumers to make informed food choices. Food labelling is a key element in providing that information.

Independent scientific studies have shown that simplified FOP nutrition labelling — which is more visible than the comprehensive and (already) mandatory nutrition table on the back of the pack — can contribute to encouraging consumers to adopt healthier diets. However, some labelling systems developed in recent years and implemented in certain countries have raised serious critical issues both with regard to their effectiveness in helping consumers to improve their diets, and to the inaccurate description that could potentially condition consumers' choices.

This is particularly the case as regards labelling systems referred to as interpretative, which use value judgements expressed in the form of colours, letters or other graphic symbols to encourage consumers to choose certain products over others considered less healthy. In certain cases, these systems do not even specify the precise content of the foods, but instead simply mark products as

"good" or "bad". These systems are fundamentally flawed, as scientific literature shows that it is not individual ingredients that are healthy or unhealthy, but rather the overall diet, in which all food groups should be suitably represented, each according to the appropriate quantities and frequencies of consumption. Interpretative systems are based on a fixed parameter, for example 100g, that does not encourage consumers to develop an awareness of their diet (and how the ingredients consumed impact on their daily intake), but rather to consume a greater (or lesser) quantity of one specific product. In this sense, a metric that considers the quantity of ingredients per portion in the context of daily intake (EFSA) is much preferable.

As such, we ask that any European-wide harmonised FOP nutrition labelling system have the following characteristics:

1. We support the EU Commission's view that FOP labelling must be simple and accessible at a glance. However, given that nutrition is a complex science, an overly simplistic system should be avoided.
2. Furthermore, such a system should not in any way limit consumer freedom and the critical ability to make informed choices by processing the information provided. If anything, it should enhance it. We should ensure that the future proposal creates the suitable conditions that enable citizens to develop their critical thinking skills, including with regard to complex situations, allowing them to make ever-better decisions. It should only contain objective data and be free of value judgements, in any form, that could result in misleading decisions by consumers, as regards the healthiness of individual products or ingredients. Therefore, it should include specific information on calories and key nutrients per portion and be aimed at achieving a healthy overall diet, based on the Reference Intakes (RI) established by the EFSA.
3. In the spirit of suitably promoting nutrients of public health importance and food groups with significant roles in the diets of European citizens, it should be developed taking into consideration the scientific impact of FOP schemes on diet and health, including the benefits and criteria guiding the choice of nutrients and other non-nutrient components of food for nutrient profiling, as well as in terms of competitiveness, consumers' attention, acceptance and understanding.

Only a system based on these criteria can truly contribute to improving the diets of European consumers, while preserving their fundamental freedom to choose.

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Austrian Economics Center

Centre for Free Economic Thought

Confederazione Italiana Agricoltori

Confagricoltura

Conservative Institute

Exporters' Association of Crete (EAC)

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