

Objective: Response to consultation – Revision of the Keyhole Regulation (LIVSFS 2005:9) Dnr 2026/00331

Submitted by Competere – Policies for Sustainable Development

19 March 2026

*Dear Swedish Food Agency,*

Thank you for the opportunity to contribute to this consultation. We submit the following observations in support of the Nordic Keyhole and to encourage a consumer-information approach that remains factual, proportionate, and respectful of consumer freedom and regional coherence.

### **key messages**

- Competere supports the continued development of the Nordic Keyhole as a credible, category-based, and regionally coherent front-of-pack scheme that has contributed positively to consumer information across the Nordic region.
- Sweden should preserve the integrity of the Nordic Keyhole framework and refrain from enabling alternative front-of-pack schemes, including Nutri-Score-type models, on the Swedish market alongside the Keyhole.
- Prescriptive scoring and warning-based models, including Nutri-Score-type systems, risk oversimplifying nutrition, guiding rather than informing consumers, and disadvantaging traditional products and smaller producers.
- The future of consumer information should move toward more factual, personalised, and technology-enabled tools that support informed choice and consumer empowerment, while considering diet within the broader context of lifestyle and the many determinants of health beyond nutrition alone, and while ensuring transparency, data protection, and human control over digital systems.

### **Introduction**

Competere welcomes the opportunity to contribute to the consultation on the proposed revision of the regulation governing the use of the Keyhole symbol and thanks the Swedish Food Agency for opening this consultation.

Public consultations are an important instrument of pluralism and constructive exchange. They allow different perspectives and evidence to contribute to policymaking. This consultation provides an opportunity to identify solutions that expand citizens' freedoms and improve consumer awareness, enabling individuals to make informed and autonomous choices.

We believe that both consumer information policies and broader public health strategies should reflect two fundamental principles that are central to the European Union: freedom of choice and recognition of individual diversity.



We are responding to this consultation because we believe that access to clear information is essential for allowing individuals to pursue a balanced lifestyle. Such a lifestyle plays a crucial role in reducing obesity, cardiovascular diseases (CVDs), and other non-communicable diseases (NCDs).

### **On the Nordic Keyhole**

Within this framework, and with the support of our scientific committee, we have long appreciated the Nordic Keyhole (NK) system.

The NK is the longest-standing front-of-pack (FoP) nutrition labelling scheme in Europe and represents an important example of a category-based approach aimed at helping consumers make more informed choices within food groups without demonizing specific ingredients. Over the years, the system has contributed to transparency and a better understanding of nutritional differences between comparable foods. At the same time, it has not created market distortions by discriminating against products that do not carry the Keyhole label.

We therefore appreciate the Swedish Food Agency's efforts to review and update the Keyhole scheme's criteria in light of evolving scientific knowledge, the Nordic Nutrition Recommendations, and changes in consumer behaviour, culture, and society. Maintaining a credible and science-based voluntary scheme is essential to ensure trust among consumers, industry, and public authorities.

### **General observations on front-of-pack nutrition labelling**

Front-of-pack nutrition labelling can play a useful role in helping consumers navigate increasingly complex food environments. However, it is important that such tools support informed decision-making without oversimplifying the complexity of nutrition and dietary behaviour or inadvertently misleading consumer choices and market competition.

Nutrition science increasingly recognizes that health outcomes are determined primarily by overall dietary patterns, lifestyle, and behavioural factors rather than by the classification of individual foods in isolation. Simplified scoring systems that apply uniform evaluation criteria across very different food categories may risk oversimplifying the complexity of nutrition and dietary patterns.

In this context, category-based approaches such as the Keyhole have several advantages. They encourage consumers to compare products within the same category and allow producers to gradually improve the nutritional profile of their products without stigmatizing specific foods.

This is particularly relevant in Europe, where food culture, culinary traditions, and local production play an important role in both nutrition and economic sustainability. Consumer behaviours also vary significantly across regions, as reflected in differences in cardiovascular disease prevalence, obesity rates, longevity, physical activity, and broader lifestyle indicators. Systems such as the Keyhole acknowledge and accommodate this diversity.

In this context, it is understandable that the European Union has not adopted a single harmonised front-of-pack labelling system across the entire Single Market. Harmonisation can be a useful instrument in some areas, but it is not always necessary if it risks undermining key principles such as competition, innovation, freedom of choice, and respect for cultural and regional diversity.

Within this broader European framework, however, consistency at the regional level can remain important where well-established schemes already exist and are widely recognised by consumers.

### **Regulatory coherence and the credibility of the Keyhole system**

The Keyhole has historically functioned as the primary front-of-pack nutrition labelling scheme across the Nordic region. Its credibility depends on clarity, stability, and consumer trust.

Introducing multiple competing front-of-pack labels within the same regional market risks creating confusion among consumers and undermining the visibility and effectiveness of existing schemes. In



regions where a long-standing and widely recognised system already exists, the proliferation of alternative schemes may reduce rather than increase transparency. It may also create the risk that one scheme prevails over others primarily due to the commercial power of certain market operators rather than its intrinsic scientific or informational merits, potentially distorting competition.

For this reason, maintaining regulatory coherence across Nordic countries remains important to preserve the credibility of the Keyhole system and ensure a clear and stable framework for both consumers and food producers.

### **Concerns regarding prescriptive front-of-pack evaluation systems**

In recent years, several front-of-pack labelling models based on evaluation or grading systems have been promoted in parts of Europe, including Nutri-Score. While these initiatives are presented as tools to assist consumers in making healthier choices, in practice they tend to guide consumer behaviour rather than simply inform it. This raises several methodological and policy concerns that merit careful consideration.

First, scoring systems such as Nutri-Score or star rating labels tend to oversimplify nutrition by assigning a single aggregated rating to foods based on a limited set of nutrients calculated per 100 grams. This approach does not necessarily reflect real consumption patterns, portion sizes, or the role that foods play within broader dietary patterns and lifestyles.

Second, these models rely on a “one-size-fits-all” logic that does not adequately recognise the diversity of individuals, lifestyles, and nutritional needs. People differ in metabolism, health conditions, levels of physical activity, and dietary habits. A simplified grading scale cannot capture this diversity and may therefore fail to reflect the real nutritional needs of individuals.

Third, such systems often provide limited factual information to consumers. A colour-coded score or rating does not explain whether a product contains an excess or deficiency of specific nutrients, nor does it allow consumers to understand the contribution of a food to their daily dietary intake. In this sense, these systems often function more as prescriptive signals than as genuine informational tools.

Fourth, these systems may unintentionally discourage the consumption of nutrients that, in balanced proportions and appropriate frequencies, are part of a healthy diet. Nutrients such as sugars or saturated fats can play a legitimate role within balanced dietary patterns when consumed in appropriate amounts and frequencies.

Fifth, scoring labels can sometimes encourage technical reformulation strategies aimed primarily at improving the rating rather than genuinely improving the nutritional quality or integrity of ingredients. Adjusting product formulations to optimise a scoring index does not necessarily result in healthier foods.

Sixth, simplified labelling systems may also generate unintended substitution effects. When foods or nutrients are strongly discouraged through simplified signals, consumers may not reduce overall consumption but rather substitute those products with alternatives that are not nutritionally superior. In such cases, the behavioural response may diverge from the intended public health objective.

Seventh, simplified scoring systems may also disproportionately affect small and traditional producers, particularly those with narrow product portfolios rooted in regional culinary traditions. In such cases, reformulation aimed at improving a score may either alter the authenticity of traditional products or create market disadvantages for producers who cannot easily modify long-established recipes. Food systems in Europe are characterised by a rich diversity of regional traditions and artisanal production, which should be preserved as part of Europe’s cultural and economic heritage.

Finally, highly prescriptive labelling approaches – including warning labels – risk shifting the objective of food policy from informing consumers to directing their choices. Warning labels represent an even more restrictive approach, as they tend to classify foods in binary terms without



providing meaningful contextual information about quantities, frequency of consumption or overall dietary patterns. For us, this distinction is fundamental: consumer information should empower individuals to understand and evaluate, not simply instruct them what to avoid. Strengthening consumer awareness and autonomy is fully consistent with the European Union’s long-standing principle of consumer empowerment.

In this context, informational approaches such as the Italian NutrInform Battery illustrate an alternative philosophy of consumer communication. Rather than assigning simplified ratings, they provide factual information that helps consumers understand the contribution of a product to their daily caloric and nutrient intake, based on recognised Guideline Daily Amounts (GDAs). Such approaches are more consistent with a model of informed and responsible choice, which also aligns with emerging developments in personalised nutrition.

### **Future perspectives: information, digital tools, and personalised nutrition**

Food information systems are evolving rapidly. Digital technologies now allow consumers to access detailed product information through QR codes, mobile applications, and online databases. These tools can provide far richer and more transparent information than simplified front-of-pack scores, while allowing consumers to consider food choices within the broader context of their lifestyle.

However, the value of such digital tools depends on their ability to provide objective and transparent information rather than replicating simplified grading or prescriptive classification systems. Digital applications, platforms or AI assistants should not merely categorise foods as “good” or “bad”, “genuine” or “industrial” based on subjective criteria or simplified definitions – such as broad classifications of processing levels – but instead help consumers understand relevant nutritional information, including caloric and nutrient intake in relation to recognised dietary reference values and individual needs.

At the same time, scientific advances in fields such as nutrigenomics and microbiome research increasingly highlight the importance of individual variability in nutrition. Combined with wearable health technologies and artificial intelligence, these developments are moving nutrition science toward more personalised dietary guidance.

In such a context, overly simplified front-of-pack scoring systems risk becoming increasingly outdated. The future of nutrition information is likely to involve more precise, personalised, and data-driven approaches that empower consumers rather than relying on prescriptive visual cues. These emerging systems will increasingly be able to integrate a wide range of interconnected variables – including dietary habits, physical activity, metabolic differences, and broader lifestyle factors – reflecting the complex determinants of obesity, cardiovascular diseases (CVDs), and other non-communicable diseases (NCDs). In this way, they not only provide richer information but can also support individuals in making more informed and balanced choices.

At the same time, the development of digital nutrition tools and AI-assisted systems raises important governance challenges. Ensuring the neutrality of AI agents, the protection of sensitive personal data, and the transparency of underlying methodologies will be essential. Ultimately, individuals must remain in control of these technologies and be equipped with the critical awareness necessary to make their own informed decisions.

Strengthening existing systems, such as the Keyhole, while exploring more advanced forms of information delivery, may therefore represent a more forward-looking strategy than introducing additional simplified labels.

### **Beyond intake: the broader drivers of health**

Finally, we would like to use this consultation to highlight that consumer information should not focus exclusively on caloric intake but also consider energy expenditure. As widely recognised in the



scientific literature and as noted above, diet-related health outcomes are influenced by many factors beyond food composition alone. Physical activity, sleep patterns, stress, and digital lifestyles play an increasingly significant role in shaping metabolic health and overall wellbeing.

Recent research has highlighted the growing impact of prolonged screen exposure and sedentary digital behaviour – a phenomenon we have described as “Ultra-Scrolling Social” (USS) – on physical inactivity, sleep disruption, and metabolic health.

Addressing these broader determinants of health requires a comprehensive approach that goes beyond food labelling and considers the wider behavioural environment in which dietary choices are made.

In this context, public policies aimed at improving consumer awareness could also include information about the health implications of excessive screen use and sedentary digital consumption. Prolonged engagement with digital devices, streaming platforms, and social media may reduce physical activity and energy expenditure, thereby contributing to weight gain and increased risks of CVDs and other NCDs. At the same time, sedentary lifestyles may also contribute to reduced physical fitness, muscular function and overall metabolic resilience.

## **Conclusion**

While front-of-pack labelling schemes can play a role in consumer information, their limitations should be carefully considered. Simplified scoring or warning-based systems risk reducing the complexity of nutrition and may unintentionally distort both consumer understanding and market dynamics.

For this reason, policy discussions on front-of-pack labelling should carefully assess the limitations of prescriptive warning and scoring systems and avoid regulatory fragmentation that could undermine existing and well-established schemes.

In this context, Competere supports the continued development of the Nordic Keyhole as a credible, category-based front-of-pack scheme that has contributed positively to nutrition communication in the Nordic region while preserving flexibility for consumers and producers.

Looking ahead, the ultimate objective of food policy should be to empower consumers with clear, factual, and meaningful information that enables them to make informed and conscious choices while preserving diversity, innovation, and the cultural value of food traditions.

Technological innovation is rapidly transforming how individuals manage their health and nutrition. Digital tools, wearable technologies, and artificial intelligence are creating new opportunities for more personalised, data-driven approaches to nutrition and lifestyle management. Public policy should support this transition while ensuring the neutrality of digital systems, the protection of sensitive personal data, and the central role of individuals in maintaining control over technology.

From this perspective, the most forward-looking approach may not lie in multiplying simplified labels, but rather in strengthening knowledge, transparency, and personalised information tools that enable each individual to pursue a balanced lifestyle.

*Prof. Michele Carruba – Head of the Scientific Committee and President of the Centre for Study and Research on Obesity, University of Milan*

*Prof. Pietro Paganini – President*

-----



## **About Competere**

We are an independent advocacy group that develops and promotes public policies to advance innovation, free trade, and real opportunities for individuals.

In today's unstable, emotional, and polarized world, you need solutions grounded in evidence and responsibility, not ideology.

That's why we combine science, critical thinking, and a liberal vision to tackle the major challenges of our time: from public health to sustainability, from food systems to emerging technologies.

We advocate for balanced, actionable policies that foster peaceful coexistence, economic growth, and individual freedom of choice.

We collaborate with international institutions, large and small businesses, the media, and civil society to transform ideas into tangible change.