

Memo

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Onderwerp: **Observations & suggestions Nutri-Score Algorithm for the Netherlands**

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Dear reader,

During our preparation for implementation of Nutri-Score on our private label, we have noticed several issues which we want to present for discussion to the scientific committee. Below are our findings and suggestions for a possible solution:

Dairy

Observation: Semi-skimmed milk or other semi-skimmed dairy products will sometimes have a Nutriscores A or B.

Explanation: Due to the saturated fat content of semi skimmed milk product around 1,0 gram per 100 ml, the NutriScore will have an outcome of a Nutriscore A if the saturated fat content is <1,0 gram and a NutriScore B if the saturated fat content is >1,0 gram. Conclusion is that two (for the customer) the same products will have a different outcome in NutriScore.

Suggestion: There are multiple suggestions for this observation. For instance, the Nutriscore algorithm can be adjusted or a branche wide commitment to use the same nutritional values for concerning products.

Observation: Iced coffees will sometimes be scored as 'drinks' and sometimes as 'food'.

Explanation: In the rules of Nutriscore calculation a product is concerned to be a food if the product contains a minimum of 80% of milk. Iced coffees have a milk content around this 80%. That means that products with 79% milk content will be scored as a 'drink' and products with 81% milk content will be scored as a 'food'. This results in a Nutriscore A for the products in the food category and a Nutriscore D or E in the drinks category.

Suggestion: Adjust the FAQ of Nutriscore and state there that all iced coffees need to be counted as a 'drink', despite the milk content of the products, because iced coffee is not consumed for the milk content.

Product with covering liquid (pickles, fruit)

- Observation: The Nutriscore for products with covering liquid can be calculated with or without the covering liquid. The FAQ states that both options are allowed.
- Explanation: This may result in producers who calculate the NutriScore with and producers who calculate the Nutriscore without the covering liquid. This results in not comparable labels between the various products in one 'shelve', one of the main principles of Nutriscore.
- Suggestion: Allow only one calculation for these products.

Prepared/unprepared (before or after cooking)

- Observation: The Nutriscore for products which need to be prepared by the customer can be calculated by the producer as bought or as prepared by the customer.
- Explanation: This concerns meal packs, but for instance also (deep fried) fries. This may result in producers who calculate the NutriScore for the products as bought or producers who calculate the Nutriscore for the product as prepared by the customer. Nutriscore has a preferred calculation method for the prepared product by the customer, but it is not mandatory. This results in not comparable labels between the various products in one 'shelve', one of the main principles of Nutriscore. This may result in not comparable labels between the various products in one 'shelve', one of the main principles of Nutriscore.
- Suggestion: Allow only one calculation for these products.

Coffee, teas

- Observation: Coffee and tea products (with or without flavouring) are permitted products in 'schijf van vijf' but will receive low scores (C or D).
- Explanation: Due to the rules of Nutriscore for drinks which both have a negative point for >0 kJ and >0 sugar products like strawberry tea with only sugar from the present strawberry will receive 2 negative points and no positive points. This results in a Nutriscore C for strawberry tea. The 'Guidance tolerances for nutrient values tolerances' gives the producer the option to round down the sugar content below 0,5 gram to 0 gram. These calculation rules ensure that suppliers will round down the nutritional value and that the customer is not informed about the real content of the product.
- Suggestion: Change the Nutriscore algorithm for drinks so products with only a few kJ and <0,5 grams of sugar receive no negative points for these values.

Bread/pasta/rice or other fiber products

- Observation: Whole grains (which are recommended in Schijf van 5) or 'less fiber/white' grains will often receive the same score which makes it unclear for customers which one is healthier.
- Explanation: Whole grain products do not receive enough benefit in the algorithm of Nutriscore.
- Suggestion: Change the algorithm of Nutriscore and give the whole grain products the earned benefit.