

To: European Scientific Committee Nutri-Score
Subject: Nutri-Score algorithm

September 15th, 2021

Dear Madam, Sir,

For many years, the Dutch health organisations have actively advocated the introduction of simplified nutrition information on the front of food packages as a health promoting measure for non-communicable diseases (NCDs). This includes NCDs such as cardiovascular disease, diabetes II, chronic kidney disease, and digestive diseases. During the past several years, the Nutri-Score labelling scheme has gained traction in The Netherlands. There are, however, considerable concerns regarding the current underlying algorithm. We hereby thank you for the opportunity to make a request to the European Scientific Committee (ESC) as to the Nutri-Score algorithm and make our concerns known.

Alignment needed with national scientific food-based dietary guidelines

We have the following request for the ESC: National scientific food-based dietary guidelines recommend to eat a more plant-based diet, lower salt, sugar and saturated fat intake, and increase fiber intake. This requires that we create a healthy food environment that facilitates the consumption of foods as recommended by national scientific food-based dietary guidelines. Front-of-pack (FOP) labelling schemes such as Nutri-Score should therefore support the movement towards a healthy diet. To make this possible for consumers, we consider it to be of crucial importance that the current algorithm be adapted and aligned with national scientific food-based dietary guidelines. From our point of view, this should be the Dutch guidelines.

The current Nutri-Score algorithm has shown to have discrepancies with scientific dietary guidelines and creates confusion among consumers. It is important that these discrepancies be resolved. In view of the above, the Nutri-Score labelling scheme should also only allow basic foods that are part of the national scientific food-based dietary guidelines to have an A or B score. Product groups outside these guidelines, that are not recommended and should be discouraged as being part of a healthy diet, should have a score that fits this line of thought (C - E).

FOP-labelling scheme should be mandatory for all foods

As a health promoting measure, it is of dire importance that the Nutri-Score labelling scheme, should it be introduced, be mandatory for all foods: both non-processed and processed.

The flaws in the current algorithm need to be resolved

The current algorithm has its flaws when it comes to healthy foods such as vegetables, fruits, nuts, and pulses. It allows addition of salt, sugar or saturated fat without impacting the Nutri-Score. For example: the same nuts with and without added salt can both score an A. Another flaw is that recommended foods, which fit within the Dutch dietary guidelines, have a score D when you expect it to have an A or B, such as for low fat, low salt cheese.

From a health perspective and the viewpoint that the algorithm be based on scientific food-based dietary guidelines, the current algorithm is unsuitable. We recommend and request that the algorithm be adapted such that these flaws are eliminated.

We thank you once more for this opportunity and look forward to our requests being acted upon.

Kind regards,
Alliantie Voeding voor de Gezonde Generatie



Bernique Tool

Chairperson of the Dutch *Alliantie Voeding voor de Gezonde Generatie*

On behalf of the Dutch Diabetes Research Foundation, Dutch Heart Foundation, Dutch Digestive Foundation, and Dutch Kidney Foundation