

ENSA Statement on plant-based products in the Nutri-Score algorithm review

July 2021

We welcome the intention of the participating countries of Nutri-Score to review and adjust the Nutri-Score algorithm.

We believe front-of-pack nutrition labelling schemes can contribute to nudge consumers into healthier food choices, and we support those schemes as long as they allow consumers to compare between products which are used in the same way and at similar consumption moments.

The specificities of plant-based products should be recognised in the algorithm, as it is currently the case in Nutri-Score, with the same algorithm used for both dairy-based drinks and plant-based drinks.

As currently stated in the Q&A, *“Plant-based drinks are not considered beverages for the purposes of calculating the Nutri-Score”* and this should be maintained. Drinkable Plant-based products are indeed not consumed to quench thirst. They are consumed at breakfast, as a snack between meals and, unlike non-alcoholic beverages, can be used in cooking and baking. They are increasingly featured in food-based dietary guidelines. In stores, they are usually placed on shelf in the dairy aisle because of the same usage which is the place where consumers look for these products. Because of their specific characteristics and use, plant-based drinks constitute, and are recognised internationally, as a separate food category, falling under specific CN sub-headings (2202 99 11 - Soya-based beverages with a protein content of 2,8 % or more by weight - and 2202 99 15 - Soya-based beverages with a protein content of less than 2,8% by weight; beverages based on nuts, cereals or seeds) that are clearly different from the other non-alcoholic beverages.

At the same time, we acknowledge that coffee- or fruit juice-based products that are only containing low amounts of plant-based drink are typically consumed as beverages, they are not poured over cereals nor used for cooking/baking. In this specific case, it would be appropriate to consider these products as beverages for the purposes of calculating the Nutri-Score. We would therefore suggest amending the list of products to which the algorithm’s beverage modification applies, as follows:

- *Mineral water and spring water (score A – dark green)*
- *Flavoured water (with and without added sugars). This category is different from mineral water and spring water and cannot be scored A – dark green*
- *Fruit juices, nectars and smoothies with or without plant-based drink addition*
- *Vegetable juices*
- *Soft drinks with added sugar and/or sweeteners*
- *Teas, infusions or coffee with or without plant-based drink addition.*

We believe this modification will help clarify the classification of such products. ENSA will be pleased to discuss the above during a meeting in case you would deem this useful and is available to provide any additional information or clarification you may need.

About ENSA

The European Plant-based Foods Association (ENSA) represents the interests of plant-based food manufacturers in Europe. ENSA is an association of internationally operating companies, ranging from large corporations to small, family-owned businesses with an annual turnover of around €1 billion. ENSA members produce high-quality plant-based alternatives to dairy and meat products. Since its establishment in 2003, ENSA has been raising awareness about the role of plant-based diet in moving towards more sustainable and healthier food consumption patterns.