

The FNLI has identified four issues for consideration for the Nutri-Score algorithm. These serve as input for the scientific committee that will evaluate the algorithm to see if it is sufficiently in line with current dietary guidelines. The issues for consideration are listed below and practical examples are provided to illustrate them.

1. Lack of sensitivity of the algorithm within product categories and potential negative effects on product reformulation efforts

One of the benefits from implementing Nutri-Score is that it gives food producers an incentive to reformulate their products. However, with the current calculation method, if products are reformulated to improve their nutritional composition (less salt, less saturated fat, less sugar, more dietary fibre or more vegetables), the score will often not improve. Furthermore, certain food products that are recommended in the Dutch Dietary Guidelines 2015 do not receive a good score.

The amount of unsaturated fats is not taken into account in many of the calculations of the score and Nutri-Score does not take into account micro-nutrients (except calcium in cheese). From a nutritional perspective, dietary fibre should be given more weight. The insensitivity of the algorithm could also mean that the healthier options within certain food categories products show no or little differences in the score, thereby missing the opportunity to guide consumers towards healthier food choices. This is caused by the fact that within product groups, products can benefit from nutrients that are not nutritionally relevant in that category and vice versa do not benefit enough from nutrients that are nutritionally relevant in that product category. The algorithm should be more sensitive to product group-specific criteria, in line with dietary guidelines.

Examples:

- For hard cheeses, no distinction can be made based on the saturated fat content. 30+ cheeses do not receive a better score compared to 48+ cheeses;
- Most oils and fats receive a D or E, independent of their unsaturated fat content, even though the algorithm takes the relationship with unsaturated fatty acids into account to a certain extent.
- Bread is an important part of a healthy diet, preferably the brown and wholemeal varieties. However for Nutri-Score, breads and grain products are being differentiated rather on protein than on fibre or salt, which are traditionally the keys to selecting healthier variants in this category;
- The Dutch Dietary Guidelines recommend to drink primarily water, tea and coffee without sugar. For beverages, only water can receive an A for Nutri-Score. Tea and coffee often receive a B or even a C, while light soda drinks often receive a B;
- For certain product categories, it is hardly possible to improve the score. Even with a large reduction in salt or sugar, for example, the score remains the same¹;
- Canned vegetables with a lot of salt receive the same score as canned vegetables with little salt;
- Unprocessed, unsalted nuts are recommended by the Dutch Dietary Guidelines, but receive a C for Nutri-Score;

¹ Example salt reduction : Herb mix X contains 21.3 g/100 g salt. Only at 0 grams of salt the score will improve, while reducing to 5g/100 g salt is already a big improvement and reducing to 0 grams is technically not possible. Example sugar reduction: Sauce X contains 35 grams of sugar and scores an E. With 5-30 grams of sugar, the sauce would score a D, while the large difference between 5 and 30 grams of sugar should be reflected in the score.

- Products enriched with micronutrients receive the same score as products that are not enriched; In fact the presence of important micronutrients at a significant level is not rewarded at all in the calculation.
- Unsaturated fatty acids do not receive any positive points except in edible fats and oils (but there's an issue there as well), while they are essential in a healthy diet (especially in nuts and fish);
- For products high in fat or sugar, the scores for the regular and the light varieties are often the same, even if there is a (big) difference in the Caloric value. A substantive reduction in Calories should have more weight in the calculation.
- Fortified dairy substitutes should not be considered a non-alcoholic beverage, as dairy is also not considered a beverage. This in line with the Nutri-Score Q&A document, published by Santé publique France.
- The ranking in scores for added fruit/vegetables/nuts 'jumps' from a two point score to a five point score, while the amount rises to the same level as between scores one and two.

2. In certain cases it is necessary to correct for portion size

With the algorithm of Nutri-Score, the score is calculated by using the amount of nutrients and/or ingredients per 100 grams. This will lead to a number of discrepancies. A correction for portion size should be applied in the cases where such discrepancies exist.

Examples

1. Meals or products that have a low salt content per 100 grams, can still contribute (too) much to the daily salt intake when the portion size is 500-1000 grams.
2. Products of which only little is consumed (for example 20 grams) may receive a low score due to the high amount of for example salt, sugar or energy per 100 grams, while the intake of these nutrients by these products is only low compared to the total diet.
 - a. Herb or spice mixes receive a low score, because of their salt content, while only a few grams of herb or spice mixes are consumed;
 - b. Product with a high energy density, but a small portion size will receive a low score due to the energy density, while these products may contain essential nutrients. For example, margarine/spreads contain vitamin D and are recommended by the Dutch Dietary Guidelines, but they will receive a D with Nutri-Score.
3. Reducing the portion of products that should not be consumed in high amounts does not improve the score and vice versa. For example, a smaller portion of a chocolate bar does not receive a higher score compared to the original bar, even though it provides less energy.

An approach² that corrects for portion size leads to better differentiation between products with different nutrient composition and is more in line with the dietary guidelines.

3. The importance of protein in the algorithm of Nutri-Score is not in line with dietary guidelines.

In the Netherlands, only few people have a protein deficiency. People are more likely to consume too much rather than too little protein. Increasing the intake of protein is not part of the dietary guidelines for the general population. Furthermore, from a sustainability perspective, the European Commission and Dutch government have the ambition to reduce the consumption of animal proteins (except for specific populations).

² With harmonised portion sizes at European level (for the product groups for which this is possible and feasible)

As an increase in protein consumption is not part of general dietary guidelines, it should not be possible to mask the high salt or low fibre (when relevant) content of a product, by adding protein.

4. Deviations from harmonised definitions and other legal inconsistencies

It is undesirable that products that belong to a certain product category according to Codex or European laws and regulations are considered as a different product category via Nutri-Score. The best known example is fermented dairy drinks, which are considered a dairy product according to Codex, but are considered a non-alcoholic drink according to Nutri-Score. As a consequence, the score for fermented dairy drinks is much lower compared to dairy drinks. The threshold of 80% milk should be reconsidered to harmonise the product categories and to make sure similar products belong to the same category.

If a nutrition and/or health claim is used on a product, the product as consumed is considered. For Nutri-Score, the product as sold is considered. This may lead to inconsistencies, as certain products are never consumed as sold but only after preparation.

Nutri-Score uses a standard rehydration factor for all dehydrated and concentrated products.