



MVO proposal for the adjustment of the Nutri-Score algorithm

For an outcome more in line with dietary guidelines

Summary

‘MVO - The Netherlands Oils and Fats Industry supports a food choice logo on the packaging. A logo with 5 scores that reflects the nutritional guidelines is a good option.’ This was the standpoint taken by MVO with regard to a food choice logo from the beginning of the discussions in 2018 and is still the position of the oils and fats sector in the Netherlands. The Nutri-Score logo offers good opportunities and many good efforts have already been put into it. However the outcome of the algorithm is not yet in line with (inter)national dietary guidelines, across the board. Therefore MVO welcomes the efforts of the COEN Scientific Body to review the algorithm. With this dossier, MVO hopes to contribute to the validity of the results by proposing three adjustments to the algorithm within the mandate of the Scientific Body. [However](#), should despite combined efforts, the end result not become in line with nutritional guidelines, then, in the interest of public health, a non-evaluative logo may be a better choice.

As part of the National Prevention Agreement 2018, the Dutch Ministry of Health, Welfare and Sport has announced the introduction of a front-of-pack food choice logo and has investigated different type of logo's. Consumer research by the ministry has shown that the Nutri Score logo is the easiest one for consumers to understand. The logo appears to communicate clearly. This is an important advantage. The fact that there is an opportunity to harmonise the logo throughout Europe is another benefit. Held up against the MVO sector's basic [principles](#), the current Nutri-Score algorithm is found to be incongruent, however, since it is not consistent with the Dutch Dietary Guidelines 2015 and the Wheel of Five. In addition, the current algorithm does not offer an incentive for product improvement, at least not for the oils and fats products. *In the annex of this dossier all relevant scientific reports are compiled that underpin our views, these are both national references as international references.*

Nutri Score is not consistent with dietary guidelines

Oils, spreads and cooking fats with less than 30% saturated fatty acids (SAFA) are part of the Dutch nutritional guidelines but cannot score higher than a 'C' in the Nutri Score logo. According to Nutri Score, products with a 'C' score should be eaten 'less often'. Meanwhile, the dietary guidelines state the opposite: in the Netherlands, we eat only half the recommended amount of spreads and cooking fats and we do not consume enough omega-3 fatty acids. The Nutri Score logo will therefore give consumers a confusing message and may lose credibility among consumers. As oils, spreads and cooking fats can only score up to a 'C', it is also not clear enough that products containing a lot of saturated fat should be replaced by products containing a lot of unsaturated fat. This means that consumers will not receive sufficient guidance on how to improve their food patterns. The logo does not offer food producers a sufficient incentive to improve their products.

The Nutri Score logo is also not in line with international dietary guidelines, such as the WHO guidelines, the EFSA opinions and approved EU dietary and health claims. Consistency with the international dietary guidelines is necessary to ensure validity, however, as well as to facilitate work

towards a harmonised logo within the EU. In order to limit this deviation from the guidelines, essential adjustments need to be made to the existing algorithm.

Proposal for adjustment

As an adjustment to the NS algorithm, MVO proposes:

1. expanding the criterion of 'fruit & vegetables' in the general algorithm to include oils and fats that are entitled to make the EU nutrition claim 'high in omega-3';
2. expanding the criteria for the group 'added fats' with a new criterion 'unsaturated fat/total fat', in accordance with the EU nutrition claim 'high in unsaturated fat';
3. introducing an adjustment to the SAFA criterion for the group 'added fats' in accordance with the EU nutrition claim 'high in unsaturated fat' .

As a whole, these adjustments will produce scores for 'added fats' ranging from B to E instead of ranging from C to E. The adjustments are in the same spirit as the current algorithm and are line with the mandate of the COEN Scientific Body. However the outcome of these adjustments does justice to the fact that some of the 'added fats' should be evaluated more healthy than others and should be preferred by consumers. The Nutri-Score logo being an across the board logo is intended mostly to make comparisons within the product category. MVO makes adjustments to offer a wider range of choices within the category (more differentiation).

MVO recognizes that there might be other ways to reach similarly improved product scores. In practice, the current criterion for energy puts a heavy burden on the product category, because of its energy density, but does not take into account the essential nutrients that the category delivers to the diet. MVO therefore remains open to other adjustments with similar outcomes. Meanwhile in this proposal, the fact that in the current algorithm added fats can only receive 'punishment' points is now countered by the possibility for added fats to also receive 'rewarding' points.

To achieve a successful introduction of the Nutri Score, good communication remains important, so that consumers do not think they eat healthy when only eating 'A' and 'B' products and no products from other scores, nor that they think they can eat as much as they want from 'A' and 'B' products.

MVO hopes that the adjustments will contribute to the creation of a harmonised food choice logo in various countries within the EU. The adjustments will increase the consistency between Nutri Score and the national and international dietary guidelines as well as the EU claims legislation, as approved by the EFSA.

Please pay attention: This dossier with annex as submitted by MVO, is based on the FEDIOL (the EU Vegetable Oil and Protein meal Industry Association) dossier and annexes on vegetable oils and fats as already submitted to the COEN Steering Committee. MVO has extended the FEDIOL proposal to also cover margarines (MVO also represents margarine producers and margarine products in the Netherlands). Compared to the FEDIOL dossier, there is a small difference in adaptation for the SAFA criterion. However this difference does not change the outcome of the algorithm for vegetable oils and fats as compared to the FEDIOL dossier. Besides please note that the adaptation for the SAFA criterion proposed, also slightly deviates from the [statement](#) that MVO released in January 2020, due to a recent change in the Nutri-Score FAQ dd 3-3-21.

Introduction

As part of the National Prevention Agreement 2018, the Dutch Ministry of Health, Welfare and Sport has announced the introduction of a front-of-pack food choice logo and has investigated different type of logo's. Consumer research by the ministry has shown that the Nutri Score logo is the easiest one for consumers to understand. The oils and fats sector welcomes a logo that helps consumers to make healthy choices easily.

In line with its previous viewpoint¹, MVO wishes to apply the following conditions to a food choice logo:

1. The logo provides valid information to consumers in line with dietary guidelines. This means that, within the NS logo, oils and fats can score between 'A/B' and 'E'
2. The logo communicates clearly
3. The logo supports product improvement through reformulation within the product group

Whilst the Nutri Score (NS) logo² meets condition 2, conditions 1 and 3 are not met. The NS algorithm means that oils and fats can only score up to a 'C' (3 scores). The logo is not consistent with the Wheel of Five (WoF) and does not offer a sufficient incentive for product improvement in the product group. The logo is also not consistent with international nutritional guidelines.

In contrast to many nutritional guidelines, the NS algorithm hardly takes a product-group specific approach. It subjects almost all products to the same measurement and does not offer the option to give particular products that make a specific but essential contribution to health, the recognition they deserve according to the dietary guidelines. The energy criterion tends to overpower other factors, such as in the case of oils and fats.

The current NS logo includes an official correction to the basic algorithm for oils and fats, partly for this reason. This correction applies to the product group 'added fats'. According to NS, this group includes the products: oils, fats, margarine products, cooking and baking products, deep-frying fats, butter and cream. This product group has an adjusted criterion for saturated fat, as an official correction to the standard algorithm³.

Spreads and cooking fats: allocation of negative points for saturated fat	
N Points	Saturated fat / total fat
0	<10
1	<16
2	<22
3	<28
4	<34
5	<40
6	<46
7	<52
8	<58
9	<64
10	>=64

¹ https://www.mvo.nl/media/file/file/mvo-standpunt_front-of-pack-logo_eng.pdf

² <https://www.rijksoverheid.nl/onderwerpen/voeding/documenten/rapporten/2019/11/28/kernboodschap-consumentenonderzoek-voedselkeuzelogo>

³ <https://www.legifrance.gouv.fr/eli/arrete/2017/10/31/SSAP1730474A/jo/texte>

Despite this correction, the NS logo is not consistent with the WoF. Spreads and cooking fats $\leq 30\%$ SAFA are in the WoF but cannot score higher than a 'C' in the Nutri Score. For products included in the WoF, you would expect a score of 'A' or 'B'. According to NS, products with a 'C' score should be eaten 'less often'. The opposite is true, however: in the Netherlands, we eat only half of the recommended amount of spreads and cooking fats and we do not consume enough omega-3 fatty acids. Consumers will therefore receive a confusing message.

As the oils and fats can only score up to a 'C', it is also not clear enough that products containing a lot of saturated fat should be replaced by products containing a lot of unsaturated fat. This means that consumers will not receive sufficient guidance on how to improve their food patterns. The logo does not offer food producers a sufficient incentive to work to improve their products.

The outcome of the NS algorithm is not valid for spreads and cooking fats

Research by the RIVM (the National Institute for Public Health and the Environment) and the Netherlands Nutrition Centre⁴ into the differences between the NS and the WoF found that the two systems are not consistent, particularly when it comes to the spreads and cooking fats product group. The administrators of the NS logo have also stated that spreads and cooking fats are not (yet) being evaluated correctly. They therefore recently made an extra adjustment to the NS algorithm themselves. This adjustment dates from September 2019⁵. Since September, this criterion includes: 'fruits & vegetables, pulses and nuts, rapeseed oil, walnut oil and olive oil'⁶. The positive effects of rapeseed oil, walnut oil and olive oil are better recognised thanks to this. Olive oil can therefore score a 'C', instead of a 'D'; for rapeseed oil and walnut oil, nothing changes however, these oils continue to score a 'C'.

Although this adjustment is a step in the right direction, it has only a limited impact on the differentiation within the spreads and cooking fats product group. In this product group, products still only score between a 'C' and an 'E', there is not a single 'A' or 'B'. The adjustment may, however, result in more recognition for composite products that contain an oil or fat as an ingredient: through replacement of an oil that scores a 'D' or an 'E' with an oil that scores a 'C', resulting in a better final score for the end product. To this extent, MVO welcomes this adjustment. However, a product like this can therefore score a 'B' whilst that is not possible for the ingredient itself, the added fat. Despite these extra positive 'P points', this adjustment does not compensate sufficiently for the negative 'N points' that this category receives in the NS logo.

The following applies to the current NS algorithm:

- Since the recent administrator adjustment in NS, rapeseed oil, walnut oil and olive oil receive extra positive points through the 'fruits & vegetables' criterion.
- Despite this fact, most oils and fats still fall into the lowest categories, between 'C' and 'E', which is not consistent with dietary guidelines.

⁴ <https://www.rijksoverheid.nl/onderwerpen/voeding/documenten/publicaties/2019/09/01/verslag-stakeholderoverleg-28-mei-2019>

⁵ Arrêté du 30 août 2019 modifiant l'arrêté du 31 octobre 2017 fixant la forme de présentation complémentaire à la déclaration nutritionnelle recommandée par l'Etat en application des articles L. 3232-8 et R. 3232-7 du code de la santé publique, JORF n°0206 du 5 septembre 2019 texte n° 6.

⁶ Olive oil, rapeseed oil and walnut oil therefore receive 5 positive points.

- There is too little differentiation, which does not sufficiently promote a healthy choice, and does not provide any incentive for product improvement.

National and international dietary guidelines

In the annex of this dossier all relevant scientific reports are compiled that underpin our views.

The Netherlands: the NS logo recommends eating spreads and cooking fats ‘less often’, whilst the WoF in fact recommends eating them *more*. In the Netherlands, we consume an average of 26 g, only half the recommended amount⁷. Only one percent of people aged 1-79 eat more than recommended. So the NS advice is not in line with the WoF and it is also not in line with the Health Council’s dietary guidelines which recommend replacing products rich in saturated fat with products that are rich in unsaturated fat⁸ and to replace butter with soft or liquid margarines. Oils and fats are the main sources of polyunsaturated fat in our diets⁹. This also goes for ALA, vitamin D, E and Folic Acid.

NS/EU countries: The Belgian Superior Health Council¹⁰ recommends a sufficient intake of polyunsaturated fatty acids (including omega-3), by giving preference to rapeseed, soybean and walnut oil and recommending the replacement of hard fats with soft/ fluid fats. Santé Publique France¹¹ recommends choosing olive oil, rapeseed oil and walnut oil, and does not advise consuming these less often. In Germany¹², the recommendation is to choose rapeseed oil, soybean oil and walnut oil. In Spain¹³ and Portugal¹⁴, oils with a lot of unsaturated fats are recommended.

EU: The current NS algorithm will not encourage choosing (soft/ fluid) oils ‘high in unsaturated fats’, as described in the EU nutrition claim, over other (hard) oils and fats.

It is also not in line with the approved EU health claim (disease risk reduction claim):

Health claim	
<p>It has been shown that the replacement of saturated fats with unsaturated fats in the diet reduces blood cholesterol. A high cholesterol level is a risk factor for the development of coronary heart disease. This claim is established in Regulation No 1226/2014.</p>	<p>The claim can only be used for foods with a high content of unsaturated fatty acids, as described in the claim HIGH IN UNSATURATED FATS, stated in the appendix to Regulation (EC) no 1924/2006 on nutrition claims.</p>

⁷ <https://www.rivm.nl/documenten/voedselconsumptie-in-2012-2014-vergeleken-met-schijf-van-vijf-2016>

⁸ Dutch Dietary Guidelines 2015, page 42, Health Council of the Netherlands

⁹ <https://www.wateetnederland.nl/resultaten/energie-en-macronutrienten/bronnen>

¹⁰ https://www.health.belgium.be/sites/default/files/uploads/fields/fpshealth_theme_file/20190902_hgr-9284_fbdq_vweb_0.pdf

¹¹ Les matières grasses ajoutées – huile, beurre et margarine – peuvent être consommées tous les jours en petites quantités. Privilégiez l’huile de colza, de noix et d’olive. Recommandations relatives à l’alimentation, à l’activité physique et à la sédentarité pour les adultes. Saint-Maurice : Santé publique France, 2019. 62 p.

¹² https://static.cnsf.asso.fr/wp-content/uploads/2019/01/2019_SPF_reco-alimentation-activite-physique-sedentarite-adultes.pdf

¹³ http://www.aecosan.msssi.gob.es/AECOSAN/docs/documentos/nutricion/alimentacion_sana_para_todos.pdf

¹⁴ <https://www.dqs.pt/upload/membro.id/ficheiros/i008722.pdf>

WHO: The NS logo is not in line with the WHO recommendation, which states: ‘replace both saturated fats and trans-fats with unsaturated fats in particular with polyunsaturated fats and replacing butter, lard and ghee with oils rich in polyunsaturated fats to lower the risk of developing non-communicable diseases’¹⁵. The WHO also recommends ensuring a food choice logo is in line with the national dietary guidelines, as well as the WHO and CODEX guidelines¹⁶.

As the NS logo on the front of a product pack is not consistent with dietary guidelines, this results in confusion among consumers and does not encourage a healthy diet. In order to reduce confusion, it is essential for adjustments to be made to the existing algorithm for as many aspects as possible in which the NS logo is not consistent with the Good Food Guidelines and the WoF. This confusion does not just affect the spreads and cooking fats product group, incidentally, it also applies to various other product groups, which we will not be covering in further detail here.

Proposal for an adjusted NS algorithm for spreads and cooking fats

For these reasons, the oils and fats sector has investigated how the NS algorithm could be improved on the basis of scientific principles. The sector is proposing three adjustments to the NS algorithm (including the administrator adjustment indicated above), namely to:

1. expanding the criterion of ‘fruit & vegetables’ in the general algorithm to include oils and fats that are entitled to make the EU nutrition claim ‘high in omega-3’;
2. expanding the criteria for the group ‘added fats’ with a new criterion ‘unsaturated fat/total fat’, in accordance with the EU nutrition claim ‘high in unsaturated fat’;
3. introducing an adjustment to the SAFA criterion for the group ‘added fats’ in accordance with the EU nutrition claim ‘high in unsaturated fat’ .

Through this proposal, spreads and cooking fats that are high in omega-3 and high in unsaturated fatty acids (and that contain a relatively lower level of fat) will be able to achieve a score of ‘B’. For spreads and cooking fats that do not meet these nutrition claims, the score will not change.

This approach is in line with the EU nutrition and health claims that have been positively evaluated by the EFSA, in line with national and international dietary guidelines *and* provides consumers and producers with reduced confusion and better opportunities to make healthy choices.

Formula proposal (N – P) for the product group ‘fats to be added’:

(E/S/S crit. + Adjusted sat. fat. crit.) – (F/P crit.+ Expanded crit. F&V + new Unsaturated fat crit.)

no 3

no 1

no 2

¹⁵ WHO ‘factsheet on healthy diet’, update October 2018. <https://www.who.int/news-room/fact-sheets/detail/healthy-diet>

¹⁶ WHO Guiding Principles and Framework Manual for Front-of-Pack Labelling for Promoting Healthy Diets, May 2019

Calculation of the adjustments in the Nutri Score algorithm

1. Expansion of the positive 'P' criterion for 'fruits & vegetables' within the general algorithm

Building on the French decision by the administrators of the NS logo to add rapeseed oil, olive oil and walnut oil to the positive criterion that now contains 'fruits & vegetables, pulses and nuts, rapeseed oil, walnut oil and olive oil', our sector proposes further expanding the criterion to include oils and fats that are 'high in omega-3'. These products make an important contribution to the intake of omega-3¹⁷, which means that this adjustment will help to achieve a higher consumption of omega-3. In the Netherlands, we consume (too) little omega-3 fatty acids and this applies to both alpha-linolenic acid and fatty acids in fish. There is an EU nutrition claim for these products, due to the health benefits of omega-3.

Products	Omega-3 content in grams per 100 g of product
Linseed oil	52
Walnut oil	11
Rapeseed oil	9
Soybean oil	6

Omega-3 fatty acid content in a number of products

Rationale: According to the evaluation of the EFSA, alpha-linolenic acid (ALA) contributes to maintaining the normal cholesterol level in the blood¹⁸, in the case of a daily intake of 2 g of ALA. This health claim can be applied to foods that meet at least the nutrition claim: 'source of omega-3'¹⁹ and is therefore also applicable to the nutrition claim 'high in omega-3'²⁰.

Specifically, the proposal is that oils and fats in the NS product group 'added fats' that meet the nutrition claim 'high in omega-3' should fall under the positive 'P' criterion, which will mean they are allocated 5 extra positive points for oils and fats and up to 5 extra points for fat spreads.

2. A new positive criterion for unsaturated fat within the NS correction for added fats

Spreads and cooking fats that contain a lot of unsaturated fatty acids make a positive contribution to a healthy diet. An extra positive criterion for products with a high unsaturated fat content will ensure more differentiation within the added fats category and therefore help consumers to make healthier choices.

Rationale: in accordance with the evaluation by the EFSA, the following health benefits of unsaturated fatty acids have been approved:

¹⁷ See footnote 9

¹⁸ <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.2203> and <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2009.1252>

¹⁹ The nutrition claim 'source of omega-3' can be applied to products that contain a minimum of 0.3 g of ALA or 40 mg of EPA and DHA per 100 g and per 100 kcal, in accordance with EU Regulation 1924/2006

²⁰ See footnote 17

- The replacement of saturated fats with unsaturated fats in nutrition contributes to the preservation of normal cholesterol levels in the blood. This health claim (Article 13) is established in EU Regulation 432/2012.²¹
- The replacement of saturated fats with unsaturated fats in nutrition contributes to the preservation of normal cholesterol levels in the blood. Oleic acid is an unsaturated fat. This health claim (Article 13) is established in EU Regulation 432/2012.²²
- It has been shown that the replacement of saturated fats with unsaturated fats in the diet reduces blood cholesterol. A high cholesterol level is a risk factor for the development of coronary heart disease. This disease risk reduction claim is established in EU Regulation 1226/2014.²³

These health claims can only be used for foods with a high unsaturated fatty acid content, as described in the nutrition claim ‘high in unsaturated fats’, established in EU Regulation 1924/2006²⁴ as follows: ‘70% of the fatty acids present must be derived from unsaturated fatty acids and unsaturated fatty acids must supply at least 20% of the product’s energy’. For a correct calculation, trans fatty acids (unsaturated fatty acids in the trans configuration, TFA) cannot be included in the amount of unsaturated fatty acids. According to EFSA recommendations²⁵, dietary intake of TFA should be as low as possible. Since years industrial TFA in oils, spreads and cooking fats have been mitigated but as only industrial TFA are recently regulated by EU Regulation 2019/649, dairy products that are part of the ‘added fats’ category, may still contain ruminant TFA in substantial amounts. Hence TFA should not contribute to the positive effect of unsaturated fatty acids in the calculation.

Specifically, the proposal is to allow added fats that are ‘high in unsaturated fatty acids’ to be allocated extra positive ‘P’ points, according to the following table:

P points	Unsaturated fat / total fat
0	content ≤ 70
1	70 < content ≤ 75
2	75 < content ≤ 80
3	80 < content ≤ 85
4	85 < content ≤ 90
5	90 > content

Added fats: allocation of positive points for unsaturated fat

3. Adjustment of the saturated fat criterion within the NS added fats category specifics

The negative ‘N’ criteria for energy and saturated fat remain unchanged in principle, except on one point. The existing correction criterion for saturated fat / total fat for ‘added fats’ is adjusted in a way

²¹ <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.2203> and <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.2069>

²² <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.2043>

²³ <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2011.2168>

²⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02006R1924-20141213&from=EN>

²⁵ <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/sp.efsa.2018.EN-1433>

that ensures that there is enough differentiation within the category and also within the part of the category that is used on the bread: fat spreads.

Rationale: Fat spreads are a common dietary product in the Netherlands among other countries and contribute substantially to the intake of unsaturated fatty acids, essential fatty acids and fat soluble vitamins. Also fat spreads may contain plant sterols that reduce blood cholesterol.²⁶ Elevated levels of blood cholesterol are a risk factor for cardiovascular disease. Consumers may receive confusing messages and the Nutri-Score may lose credibility, if on one hand a product is recommended by nutritional guidelines and on the other hand scores a “C” in the algorithm.

Furthermore through this adjustment olive oil can score a ‘B’ instead of a ‘C’, so that now all specifically recommended oils can score a ‘B’. Oils that are high in omega-3 are specifically recommended in many dietary guidelines (see the annex) along with olive oil. The saturated fat content of all these products is contributing to the negative points on top of the negative points for energy. By moving the threshold in points for the ratio saturated fat/ total fat for products that are ‘high in UFA’, the outcome of the algorithm does justice to the fact that some of the ‘added fats’ should be evaluated more healthy than others and should be preferred by consumers.

Specifically, the proposal is to allocate 0 N points for SAFA/Total Fat for added fats that are ‘high in UFA’²⁷ :

N Points	Saturated fat / total fat
0	<10
0	<16
0	<22
0	<30
4	<34
5	<40
6	<46
7	<52
8	<58
9	<64
10	>=64

Added fats: adjusted allocation of negative points for saturated fat

Result of these adjustments

As a whole, these adjustments will produce scores for ‘added fats’ ranging from B to E instead of ranging from C to E. The proposed adjustments counter the fact that in the current algorithm added fats can only receive ‘punishment’ points, by creating the opportunity for added fats to also receive ‘rewarding’ points. This is in line with the positive and essential nutrients these products contribute to a healthy diet. The adjustments are in the same spirit as the current algorithm and are in line with the mandate of the COEN Scientific Body. Nevertheless MVO remains open to other adjustments with similar outcomes that take into account the essential nutrients that the category delivers to the diet and that will assure consumers don’t cut down on added fats unnecessarily.

To achieve a successful introduction of the Nutri Score, good communication remains important, so that consumers do not think they should only eat products in categories ‘A’ and ‘B’. When it comes to

²⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02009R0983-20140711&rid=1>

²⁷ Please note that this adaptation slightly differs from the SAFA adaptation in the FEDIOL dossier, to include margarines

the spreads and cooking fats product group, you can certainly also consume 'C' products. These often contain a lot of unsaturated omega-6 fatty acids, including the essential linoleic acid. Nor should consumers think they can eat as much as they want from 'A' and 'B' products.

MVO hopes that the adjustments will contribute to a harmonised food choice logo in multiple countries within the EU. The adjustments will improve the consistency between NS and the national and international dietary guidelines as well as the EU claims legislation, as approved by the EFSA.