



Dutch Ministry of Health, Welfare and Sport COEN Steering Committee

Zoetermeer, 7 July 2021

Subject:

- Proposal for the adjustment of the Nutri-Score algorithm
- Annex: Scientific References

Dear Government Representatives and Members of the COEN Steering Committee,

Please find attached a dossier with science based adaptations for to the Nutri-score algorithm, as suggested by MVO – the Netherlands Oils & Fats Industry. [MVO](#) is the chain organisation for companies in The Netherlands that import, transport, produce, export and recycle edible oils and fats. Many of these oils and fats are used in foods of various nature, such as margarines.

MVO has supported and still supports the introduction of a front-of-pack food choice logo for consumers. As everyone involved, MVO is of the opinion that such a logo can only lead to a healthier food choice by consumers if it is in line with nutritional guidelines. Unfortunately there are some cases in which the Nutri-Score algorithm is not in line with nutritional guidelines, one of these cases is the 'added fats' product category. Within the algorithm this is a separate category, and this we welcome. This gives the opportunity to improve the outcome of the algorithm for this category further. As the Nutri-Score FAQ already states: *'the [original] FSA score algorithm must be optimised to better account for saturated fatty acid contents'*.

In Europe, the overall nutritional recommendation is to replace saturated fatty acids in the diet by unsaturated fatty acids in the diet, mainly poly unsaturated fatty acids. Furthermore to eat enough of the essential fatty acids: the poly unsaturated fatty acids n6 - linoleic acid and n3 - alfa – linolenic acid. In the annex you can find references for these recommendations, such as the WHO guidelines, the EFSA opinions, the Dutch guidelines and approved EU nutrition- and health claims.

The current Nutri-Score algorithm is not consistent with dietary guidelines

Oils, spreads and cooking fats $\leq 30\%$ SAFA are in the Wheel of Five in certain daily quantities. In the Netherlands, we eat only half the recommended amount of oils, spreads and cooking fats and we hardly consume enough omega-3 fatty acids. Historically, there is a strong tendency among consumers who want to lose weight to cut down on fats, including the healthy and essential fatty acids, which is not in the interest of public health. Within the Nutri-Score logo these fats cannot score higher than a 'C'. According to Nutri-Score, products with a 'C' -score or a lower should be eaten 'less often'. The current Nutri-Score logo will hence give consumers a confusing message. Furthermore, as oils, spreads and cooking fats can only score a 'C', 'D' or 'E', it is not clear to consumers that saturated fatty acids should be replaced by unsaturated fatty acids. There is not enough differentiation. This means that consumers will not receive sufficient guidance on how to improve their food patterns. Likewise food producers will not get a substantial incentive to reformulate their products. And, when used as an Nutrition Profile, it might make nutrition – or health claims impossible on products that are suitable for making a claim.

The Nutri-Score algorithm should reflect the nutritional recommendations, perhaps not so much in the algorithm itself, but particularly in the outcome of the algorithm, the product scores. In this dossier we propose to change the algorithm in a way that creates product scores that are more in line with nutritional recommendations for the group 'added fats', without changing the basics of the algorithm.



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 its earlier adjustments, 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. While not questioning this construction of the algorithm, 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 these proposed adjustments, 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.

MVO trusts that the proposed adjustments will contribute to a well-accepted and harmonised food choice logo in members states from within the EU and will contribute to public health. The adjustments will increase the consistency between Nutri-Score and the (inter)national 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 Proteinmeal 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.

MVO hopes the Dutch Government and the Steering Committee will take the adjustments into consideration and we are available to answer your questions,

Kind regards, on behalf of the member companies

Frans Claassen
Managing Director