

Ministerie Volksgezondheid, Welzijn en Sport  
Directie Voeding, Gezondheidsbescherming  
& Preventie (VGP)  
To Ms. J. Hulst  
PO BOX 20350  
2500 EJ THE HAGUE

Zoetermeer : 1 September 2021  
Our ref. : 21N121/BN

**Concerns : Adaptation of the algorithms of the Nutri-Score required**

Dear Ms Hulst,

The Netherlands Association for the Trade in Dried Fruit, Spices and allied products (NZV) is the trade association for all Dutch traders in nuts, dried fruit, spices and processed vegetable, fruit and fish products. The processed products are both frozen products and canned goods.

We have been brought to the attention of our German sister organization Hamburger Warenverein that there are substantial errors in the algorithm used in the food choice logo Nutri-Score. As a result, certain products that are healthy are regarded as unhealthy choices. Our German sister organizations have already pointed this out to their government. We also want to inform the Dutch government and the international scientific committee of the Countries officially engaged in Nutri-Score" (COEN) about this.

We have set out our concerns in five points below. All concerns have in common that foods that are nutritionally equivalent should be judged equally.

### **1. Equal treatment of Eurocode 2 Group 7.30 "Seeds and kernels" with Eurocode 2 Group 7.40 "Nuts"**

Reason: Seeds and kernels have similar, very positive nutritional profiles to nuts.

Explanation: Not including seeds and kernels in the group of foods that positively influence the Nutri-Score<sup>1</sup> confuses the consumer and does not provide a basis for a "good choice". This does not only apply to manufactured foodstuffs consisting of different compounds, e.g. mueslis or bars containing more than 40% fruit, nuts, seeds

and kernels. Even as mono-products and ingredients for the home kitchen or as a snack, seeds and kernels unjustifiably perform worse than nuts in the packaging competition.

A practical example: a company offers nuts and oilseeds under its brand. If it applies to the use of the Nutri-Score for its brand, all articles of the brand must be marked with the Nutri-Score accordingly. Almonds, hazelnut kernels and walnut kernels e.g. would be rated with an "A" score. Sunflower seeds would currently perform with a rating of "C".

If the same rating criteria were used for sunflower seeds as for nuts, sunflower seeds would score an "A," which corresponds to the nutrition facts. It is therefore currently not possible for the consumer to make a good choice within this product group based on the Nutri-Score.

## **2. Equal treatment of linseed oil, hemp oil, chia oil, sunflower oil and other oils rich in polyunsaturated fatty acids with canola oil, walnut oil and olive oil**

Reason: These oils have similar, very positive nutritional profiles such as canola, walnut, and olive oil.

Explanation: Not including the other oils rich in polyunsaturated fatty acids in the group of foods that positively influence the Nutri-Score<sup>2</sup> confuses the consumer and does not provide a basis for a "good choice".

## **3. Equivalence of freeze-dried fruits and vegetables with fruits and vegetables dried by the application of heat**

Reason: Freeze-drying is a particularly gentle drying process in which temperature-sensitive vitamins such as e.g. vitamin C is preserved.

Explanation: Freeze drying is therefore nutritionally superior to conventional drying methods. Therefore, there is no nutritional justification for excluding freeze-dried fruits and vegetables from the group of foods that positively affect Nutri-Score<sup>3</sup>. The current regulation creates confusion among consumers and does not provide a basis for a "good choice".

## **4. Adding macadamia nut kernels to the nut list**

Reason: Macadamia nut kernels have been released since Scarborough et. al. was published in 2005 and clearly belongs to the group of nuts botanically and nutritionally.

## **5. Adding lupines to the legume list**

Reason: Since the publication of Scarborough et. al. was published in 2005 and clearly belongs to the legume group, botanically and nutritionally.

We would like to ask you to address our concerns and present them to the newly established Scientific Committee of the COEN States and discuss them there. We look forward to staying in touch with you and are always available to answer any questions you may have.

Yours sincerely,

**The Netherlands Association for the Trade in Dried Fruit, Spices and allied products**

A handwritten signature in black ink, appearing to read 'Barbara Niemans', written in a cursive style.

Barbara Niemans  
secretary general