



PepsiCo Europe supports better consumer information and is committed to add more choices to its food and beverage portfolio. Building on progress already made, PepsiCo continues the journey of added sugars reduction in beverages, sodium and saturated fat reduction in foods.

PepsiCo welcomes the opportunity to provide input and feedback to improve Nutri-Score, a nutrition front of pack labelling helping consumers to make informed choices and encouraging food and beverages reformulation.

1. Definition of “minimally processed fruit, vegetables and pulses”

Are there other examples of processing beyond what is included (peeled, sliced, tinned, frozen, purees, pulp, grilled, roasted or marinated) that can be considered minimally processed if it can be demonstrated that the nutritional attributes, such as protein and fiber, are the same/similar to the unprocessed product? For example, pulse flours/meals/grits that have the same or better nutrient levels vs. pulses. See below:

A. Chickpea

	US Standard Food Database USDA	EU Standard Food Database McCance and Widdowson	Commercial Ingredients			USDA (Flour)
	Whole Chickpea Raw Seed USDA 16056	Whole Chickpea EU Database	Chickpea Flour	Chickpea Meal	Chickpea Grits	Whole Chickpea Flour (Besan)- USDA 16157
	% Dried Weight Basis					
Protein	22	24	25	25	25	25
Total Fat	7	6	8	8	8	7
Total Ash	3		3	3	3	3
Total Carbohydrates	68	55	71	71	71	64
Total Dietary Fiber	13	12	20	20	20	12
Iron	0.005	0.006	0.0022-0.0066	0.0022-0.0066	0.0022-0.0066	0.005
Potassium	0.778	1.1	0.4420-0.8839	0.4420-0.8839	0.4420-0.8839	0.943

B. Black Beans

	USDA Standard Food Database	EU Standard Food Database	Commercial Ingredients	
	Black Bean Raw (USDA 16014)	Black Bean Raw	Black Bean Flour	Black Bean Grits
	% Dried Weight Basis			
Protein	24.3	No entry found	24.3	24.3
Total Fat	1.6		3.3	3.3
Total Ash	4.0		4.4	4.4
Total Carbohydrates	70.1		74.0	74.0
Total Dietary Fiber	17.4		25.4	25.4
Iron	0.006		0.0044 - 0.0077	0.0044 - 0.0077
Potassium	1.66		0.9945 - 1.1602	0.9945 - 1.1602

C. Navy Beans

	US Standard Food Database USDA	EU Standard Food Database McCance and Widdowson	Commercial Ingredients	
	Navy Bean Raw (USDA 16037)	Navy Bean (Haricot) Raw	Navy Bean Flour	Navy Bean Grits
	% Dried Weight Basis			
Protein	25.4	24.1	24.3	24.3
Total Fat	1.7	1.8	3.3	3.3
Total Ash	3.8		4.4	4.4
Total Carbohydrates	69.1	56	72.9	72.9
Total Dietary Fiber	17.4	19.2	25.4	25.4
Iron	0.006	0.0076	0.002-0.006	0.002-0.006
Potassium	1.3	1.3	0.54-1.16	0.54-1.16

2. RATIONALE for excluding seeds and additional unsaturated oils from counting toward positive points

A. What is the rationale for excluding seeds (chia, poppy, sunflower, flax and pine nuts) when they have the same/similar key nutritional attributes such as fiber and protein?

	USDA Database #	Fiber per 100g	Protein per 100 g	Calories per 100 g
NUTS				
Almonds	12061	12.5	21.15	579
Walnuts	170187	6.7	15.23	654
Cashews	110519	2.9	14.85	583
Pecans	170182	9.6	9.17	691
Peanuts	173806	8.4	24.35	587
AVERAGE		8.02	16.95	618.8
SEEDS				
Sunflower Kernels	170563	11.1	19.33	582
Poppy seeds	BRANDED	10	17.24	552
Pine Nuts	1100548	3.7	13.69	673
Chia (whole)*	BRANDED	38	23	500
Flax (whole)	1100610	27.3	18.29	534
AVERAGE		18.02	18.31	568.2
*Complete Protein				

B. The Nutri-Score Q&A states that *“The fruits, vegetables, pulses and nuts”* component has been modified in October 2019 better considers the nutritional recommendations for oils in Europe. The percentage of rapeseed, walnut and olive oils in the products is now included in the positive component *“fruits, vegetables, pulses, and nuts.”* What is the rationale for including only rapeseed, olive and walnut oils when there are other unsaturated oils that are included in several regional and global food based dietary guidelines. EU and WHO example recommendations are highlighted below:

- i) Austria (2009): Prefer high-quality oils: olive, rapeseed, walnut, soybean, linseed, sesame, maize, sunflower, pumpkin, grapeseed and nut
- ii) Belgium (2017): Use good fats, such as unsaturated fatty acids (olive oil), omega-6 (sunflower oil and soya oil) and omega-3 (canola oil, nut oil and soya oil and fatty fish).
- iii) France (2019):
 - (1) Move Towards rapeseed oil and nut oil
 - (2) Rapeseed and nut oils are rich in omega-3
 - (3) Rapeseed and nut oils (rich in ALA) vs those low in ALA (sunflower and peanut)
- iv) Ireland (2016): Choose MUFA or PUFA, rapeseed, olive, canola, sunflower or corn oils.
- v) Switzerland (2016): Rapeseed, olive, walnut, flaxseed, wheat gram soybean, sunflower
- vi) UK (2018): Unsaturated fats are healthier...for example vegetable oil, rapeseed oil, sunflower, and olive oil.
- vii) WHO: recommend replacing butter, lard and ghee with oils rich in polyunsaturated fats, such as soybean, canola (rapeseed), corn, safflower and sunflower oils

3. Sports drinks / Carbohydrate electrolyte solutions not covered by Nutri-Score

The Nutri-Score Q&A states that *“given the specificities in terms of the nutritional composition, supervision and purpose of food products designed for special diets [...], it is not recommended to apply the Nutri-Score to these products:*

- *preparations for infants and follow-on formula;*
- *cereal-based preparations and food products for babies;*
- *food products designed for special medical purposes;*
- *meal substitutes for weight control and substitutes to the total daily ration for weight control, etc”*

Similarly, Carbohydrate electrolytes solutions, which *“contribute to the maintenance of endurance performance during prolonged endurance exercise, enhance the absorption of water during physical exercise”* as defined in the [Nutrition and Health claim regulation](#), have specific nutrition composition designed to meet specific dietary needs during effort. Nutri-Score should not be recommended to be applied in these products.