

14 September, 2021

Ministry of Health, Welfare and Sport
Ms. H.G. (Inge) Stoelhorst

Dear Sir/Madam,

Thank you for the invitation for stakeholders to make requests to European Scientific Committee for Nutri-Score.

The key challenge for public health nutrition for the next decade is to make the healthy choice the easy choice, everywhere. A coordinated set of measures is needed to achieve this, and a Front of Pack label guiding consumers to the healthier choices at the point of purchase can be part of this.

We strongly applaud the initiative to adapt the French Nutri-Score system for Europe. We do see a number of risks. Please find below issues that we consider crucial for success or failure of Nutri-Score and would like to see addressed:

1. Risk of low consumer trust through lack of alignment with Food Based Dietary Guidelines

Dietary guidelines are the basis of nutrition communication for governments in all countries and the central in this are whole (unprocessed) foods that are beneficial for health. WHO is supportive of Front of Pack-label, provided it is aligned with national dietary guidelines. Consumer research has shown that discrepancies with dietary guidelines creates confusion and reduces trust, both in Nutri-Score and dietary guidelines.

To address this issue, we suggest that:

- Basic foods-groups that are part of a healthy diet, and thus recommended by food based dietary guidelines (FBDG), should be able to obtain a positive score that encourages use (e.g., a green A or B): fruit and vegetables; wholegrain products; plant oil (-products); nuts; fish; dairy; pulses; water, coffee, tea.
- Product-groups that are not in the FBDG or specifically discouraged by FBDG, should not be able to get a positive score (e.g., not better than C): sweets, snacks, cookies, sauces, sugary drinks including juices, red meat, processed meat, white (refined) grain products.

2. Risk of being seen as ultra-processed food logo

Nutri-Score is currently more used on packaged, processed foods than on basic foods. We support the efforts of the Steering Committee to ensure a full coverage of the market, including all fresh foods. This to ensure the logo receives the authority it deserves and avoids the perception that it is only on 'crap' food. The worst-case scenario that we have to avoid is that Nutri-Score will be seen as a system where food-producers have a license to add unhealthy ingredients or to health wash unhealthy foods

For the Scientific Committee we have one recommendation in this context. WHO and national guidelines recommend to lower salt, sugar and saturated fat intake. There is a long way to go, which needs product reformulation schemes. The Nutri-Score should support the movement to lower salt, sugar and saturated fat by producers.

The current algorithm has a flaw when it comes to pure, healthy and whole foods (such as vegetables, fruits, nuts, pulses, dairy): it allows addition of some salt, sugar or saturated fat without impacting the Nutri-Score. As an example: the same nuts with and without added salt can both score an A.

Secondly, the addition of healthy nutrients (fibre, protein) allows for the simultaneous addition of unhealthy nutrients. Why this is possible, is difficult to explain by national agencies and dieticians. Also, it may lead to product reformulation in the wrong direction: more salt and sugar.

As a result, Nutri-Score creates opportunities for ultra-processed foods.

We ask the committee to find a solution for this.

3. Risk of misinterpretation of the logo by the consumer in the real world

Various (online) studies have shown that Nutri-Score helps consumers to select healthier products within a product-group easier than with other systems. The visual of the logo seems to work. The question now is how it will work in real life. We see several issues around how consumers may perceive and use the system and ask the committee to address this.

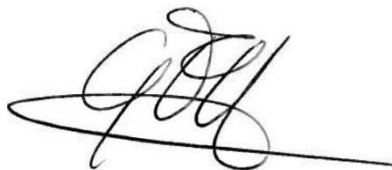
Conditions for Nutri-Score to be effective in making healthier choices in real life:

- The logo should be present on all products. As the system is not yet mandatory, not all products will have logos. How does that affect the effectiveness of the system, if products cannot really be compared?
- The logo should help consumers to primarily select products that are recommended in FBDG and discourage products that are less healthy. The fact is that Nutri-Score will be available on products at point of purchase and FBDG usually are not, therefore they should be fully aligned.
- Nutri-Score should be able to identify the healthier choice within a food group and a healthier choice across food groups.
- It should work especially for lower socio-economic groups, and low literacy groups.

Thanks again for giving up the opportunity to put forward our requests. We wish the committee success with improving the system.

Yours sincerely,

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