

AREPO POSITION ON THE REVISION OF RULES ON INFORMATION PROVIDED TO CONSUMERS: FRONT-OF-PACK NUTRITION LABELLING

In the framework of the Farm to Fork strategy, the European Commission has announced several actions aiming to facilitate the shift towards healthier and more sustainable diets. Particularly, in order to empower consumers to make healthy food choices by understanding labelling information, **the EC intends to establish a harmonised mandatory front-of-pack nutrition labelling (FOPNL).**

AREPO agrees with the European Commission that one of the biggest challenges ahead is to be able to consume and eat within planetary limits and preserving health. We do believe that a shift towards more sustainable and healthier behaviours is needed, enabling consumers to fully understand both the nutritional aspects of a food and its role in the food system of reference. Nevertheless, **AREPO fears that the means chosen to pursue these objectives may confuse consumers preventing them from building clearly informed evaluations of a product.** Specifically, AREPO would like to lay stress on the fact that **simplified and synthetic information may harm products covered by EU Quality Schemes**, limiting the impact of the ongoing efforts to fully unfold their potential¹.

It cannot be forgotten that EU Geographical Indications (GIs) are often **associated with the production of public goods**, considered in terms of sustainable rural development, growth and employment, diversification of rural economy, protection of natural resources and landscape, welfare of farm animals, food security, food safety and traceability². As a result, besides being the expression of EU culture and identity and representing 15.5% of the total EU agri-food exports³, **they contribute in several ways to sustainability** (social, economic, environmental) **and to sustainable food system⁴, representing pivotal instruments to meet the objectives at the heart of the Farm to Fork strategy.**

Additionally, they are a guarantee of safe, traceable and high-quality products. Thousands of operators in the GI scheme have acquired and increased their knowledge and skills concerning control and traceability, in order to produce in strict compliance with the conditions and standards detailed in the product specification.

1. FOPNL: THE RISK FOR EU GIS OF AN OVERSIMPLIFIED NUTRITION INFORMATION

Among the options currently under assessment by the European Commission⁵, **AREPO firmly believes that a FOPNL using colour-coding combined with a graded indicator, such as the Nutri-Score, as well as synthetic methods that combine nutritional value and a health judgement without considering portion size or daily diet, will not be fit for purpose, due to the oversimplification of information provided.**

We question that this type of FOPNL will provide clear and accurate information to consumers, especially with regards to GIs and traditional products.

In details, AREPO would like to stress that:

- Any colour-coded system with a graded indicator **oversimplifies the nutrition information of a product.**

¹ [Food & drink – EU geographical indications scheme \(revision\)](#)

² [AREPO Position Paper on European Commission Evaluation of Geographical Indications and Traditional Specialities Guaranteed Protected in the EU](#), January 2020

³ Study on economic value of EU quality schemes, geographical indications (GIs) and traditional specialities guaranteed (TSGs), 2020. AND-International, Directorate-General for Agriculture and Rural Development (European Commission), ECORYS

⁴ [Strengthening sustainable food systems through geographical indications: An analysis of economic impacts](#), FAO, Rome, 2018

⁵ [Inception Impact Assessment, Proposal for a revision of Regulation \(EU\) No 1169/2011 on the provision of food information to consumers](#)

Fruit and vegetables excluded, Geographical Indications and some single ingredient products (charcuterie, cheese, olive oil) praised for their nutritional value as part of a balanced diet, **may be disadvantaged by an oversimplified nutrition presentation.**

In fact, this system awards a score to food (positive and/or negative points) on the basis of an algorithm which assesses the content of energy, sugars, saturated fat, sodium, protein, fibre and the overall percentage of fruit, vegetables, pulses, nuts, olive, rapeseed and walnut oils. Thus, **the algorithm mixes certain nutrients, foods and calories without distinction.** Plus, while in the negative elements it only includes quantities of saturated fats, sodium and sugars in addition to calories, in the positive elements it adds to proteins and fibre, percentages of fruit, vegetables, nuts, legumes and olive, rapeseed and walnut oils. Thereby, positive points consider foods and some nutrients, while the negatives depend on nutrients and calories. This, **ignoring as well nutrient groups with a significant positive effect on human health**, such as the content of vitamins, minerals and probiotics, usually highly recommended in the context of a healthy diet.

Furthermore, **it does not rate foods according to their category**, as the same algorithm applies to the evaluation of all products. However, **the assessment of the same components in different food categories might result confusing.**

For instance, the evaluation of a product such as olive oil cannot be based only on the fat content, or the amount of salt or sugar, as the Nutri-Score suggests, because it will miss out three crucial elements proving the quality of olive oil: **Organoleptic Characteristics, Biological – Dietary value and food safety.** As a consequence, Nutri-Score will not be able to enhance the difference between types of oils like an extra virgin olive oil and an olive oil. As a matter of facts, although they are derived from the same plant, they are nutritionally and organoleptically very different (Commission Regulation (EEC) No 2568/91 of 11 July 1991 on the characteristics of olive oil and olive-residue oil and on the relevant methods of analysis). Moreover, oils of different origins (e.g. extra-virgin olive oil and palm oil) would be evaluated on the basis of the same nutrients and receive similar ratings, even though they have widely differing organoleptic qualities.

- In addition, the Nutri-Score **does not take into account the level of processing of a product.**

One of the objectives of the Nutri-Score is to encourage industrial manufacturers to improve the recipe of their ultra-processed products. However, this reformulation will not necessarily rhyme with nutritional improvement. Thus, Nutri-Score may favour the consumption of certain products while neglecting their content of preservatives and additives, artificial sweeteners or any trans fats, meaning that, in its evaluation, some ultra-processed and industrial food might perform better than traditional and very little processed products, like GIs.

Products covered by a geographical indication respond to very strict conditions and standards described in the **product specification.** They are low-processed and contain a low number of ingredients, with little or no use of additives or correctors. They derive their qualities from a careful dosage of basic ingredients.

- Due to their composition and traditional characteristics detailed in the product specification, **reformulation is seldom possible for GIs.** Their nutrient profiles and production techniques cannot be altered **without changing the very nature of the product.**

The major risk is that consumers might move away from traditional and GI products, which comply with high quality specifications and have an interesting nutritional profile, in favour of similar industrial products which might favour a lighter recipe to the detriment of nutritional qualities. As a consequence, **Nutri-Score might be source of discrimination and might contradict the provisions of Article 35, section 1, letter f, of Regulation 1169/2011, which states that additional forms of expression and presentation of the nutrition declaration shall be objective and non-discriminatory.**

Therefore, to call into question this principle and to consider GIs as comparable to conventional products would undermine the very foundations that have allowed them to be treated under specific status in the framework of the WTO TRIPS agreements.

Furthermore, AREPO warns as well on the possible impact on GIs of *Action 15* and *16* of the Farm to Fork Action Plan:

- The intention of the Commission **to stimulate product reformulation** (Action 15) and **to set up nutrient profiles** to restrict the promotion (via nutrition or health claims) of foods high in fat, sugars and salt (Action 16) could represent **a serious threat for GIs, if they are not considered as an exception to this process**. These actions should be limited to industrial products.
- Additionally, the Nutri-Score provides **limited information on nutritional balance**. It does not take into account the **dietary intake**, nor the **daily balanced diet**, nor the notion of **pleasure food**.

As a matter of fact, this system assigns points **based on the nutritional composition per 100 g or 100 ml of the product**. As a result, certain foodstuffs, e.g. festive products, will be rated as bad **not considering the low frequency and low quantity of consumption**.

On the contrary, healthy diets should include a wide variety of foods taken in different amounts and forms. Hence, a front-of-pack labelling should include some indication to consumers to understand whether they can use the product on a daily, weekly or occasional basis. In this respect, **GIs provide an essential part of this variety**, being often alternatives to highly standardised forms of diet dominated by conventional foods.

It should be also born in mind that **cooking and consumption methods** affect the food intake.

Plus, as stressed in the EC report on FOPNL initiatives⁶, the visual bias of **perceiving certain food as healthy**, might lead to **underestimating quantity and energy content**, indulging in excessive intake of food or large portion sizes.

To conclude, the **hedonistic dimension of food cannot be forgotten**. Cognitive science shows that the quality of nutrition, **with taste and pleasure at the forefront**, has important health benefits.

To this, we should add as well the **cultural dimension linked to GI food consumption**. These products are expression of their territories of origin and are associated with the **sense of belonging to cultural communities** where GIs play an important role.

2. AREPO PROPOSALS TO SAFEGUARD GIS IN A SCENARIO WHERE THE NUTRI-SCORE IS IMPLEMENTED

Previous reasoning intends to substantiate and explain **AREPO's grounds for opposing Nutri-Score**, due to the approximate information that Nutri-Score can provide to consumers with regard to products covered by EU quality schemes. Particularly, a labelling system which does not consider significant nutrients in the overarching nutritional evaluation of a product contradicts the existing nutritional recommendations and cannot be considered a reliable guide to consumers in the shift to healthier diets.

Consequently, **AREPO firstly urges the European Commission to consider the exemption from Nutri-score of products under EU quality schemes (PDO, PGI, STG)**, traditional products and single-ingredient products like olive oil.

⁶ European Commission, [Report regarding the use of additional forms of expression and presentation of the nutrition declaration](#), COM(2020) 207 final

However, figuring a scenario where the Nutri-score might be implemented as mandatory FOPNL at EU level, **AREPO would like to encourage the European Commission to ponder the following proposals:**

- **The algorithm at the basis of Nutri-Score should be modified.** Specifically, it should be anchored to **science-based criteria capable to assess all important nutritional components for each food category.**
- Therefore, it is necessary **to establish and define categories** to be able to compare products within them and to review the elements that are most appropriate to be taken into account for assessment;
- **A rating based on food portions** is also essential.
- Within this context, **the European Commission should also consider a *de facto* classification, after a category evaluation, for PDO/PGIs and some traditional and single-ingredient products** (e.g. the International Olive Oil Council proposed the classification of olive oil in category A (green)).

Finally, in line with the promotion of a swift towards more sustainable and healthier diets and considering that EU GIs contribute to social, economic and environmental sustainability, AREPO would like to stress that these elements should also be integrated in the overall evaluation of a product, **providing consumers a comprehensive understanding of a GI and its impact in terms of both health and sustainability.** Consequently, it should be made easier for GI producers to emphasise all this information in accordance with labelling rules, for instance by developing and implementing **smart digital labelling.**

3. NUTRITION EDUCATION TOWARDS A DIVERSIFIED AND BALANCED DIET

To conclude, **AREPO would like to reiterate its support for the Commission intention to empower EU citizens and consumers to adopt more sustainable and healthier behaviours.**

For all the reasons previously expressed, we encourage the Commission to analyse the impact of several policy options, without focusing *a priori* on a FOPNL using colour-coding combined with a graded indicator, like the Nutri-Score.

Nonetheless, **our conviction is that FOPNL cannot alone engender such an ambitious long-term change.**

As a matter of fact, fighting off **unbalanced nutrition**, recognised as cause of several lethal diseases, **requires nutrition education in order to increase consumers' nutrition knowledge** as well as their understanding and use of information eventually provided with the nutrition declaration.

Consequently, AREPO would like to recommend to the European Commission to address its efforts **towards more education and better communication on the importance of a diversified and balanced diet and how EU Geographical Indications and quality products can contribute to it.**

The main message should be focused on the idea of "*eating consciously*", reintroducing the notion of **portion** and **daily intake**, combined with the adoption of a **more active lifestyle to reverse the consequences of sedentariness.**

Plus, emphasis should be placed on the priority of **dietary diversity**, encompassing different categories of food, tastes, seasonality, freshness, culture and skills.

EU PDOs and PGIs fit in this context. It is worth noting **that many GIs are associated with specific diets recognized for their interest in terms of nutrition**, as proved by the renowned example of the Mediterranean diet. The traditional ways of cultivating plants and raising animals, the influence of natural conditions, the human practices as well as the traditional methods of processing and

conservation, are crucial in the nutritional quality of GI products. Also, GIs represent the **hedonistic dimension of food**, combining high quality with incredible taste, and the **cultural dimension of belonging to a community**.

Therefore, **GIs have great potential in playing a significant role in the shift to healthier diets**, through their own qualities, including nutritional and organoleptic ones, and influence on consumer behaviours.⁷

AREPO calls as well upon the Commission to establish alternative ways of communicating the high quality of these products to consumers, eventually considering how to engage producers and consortia in this process.

As a result, AREPO would like to suggest to the European Commission:

- **To increase scientific research on GIs and their nutritional potential within dietary patterns.** GIs nutritional value should be **studied in a holistic way**, not considering exclusively the individual components but **exploring their contribution within a balanced daily diet**, also as alternatives to conventional products;
- **To encourage the publication of data and results.** The availability of data will make easier to share them among researchers, international and national organizations, policy makers as well as increase producers' awareness on the nutritional quality of their products and their impact on health;
- **To better involve producers, encouraging them to provide comprehensive information on their products** and how they are linked to the origin;
- **To keep allocating a sizeable budget to Promotion of EU Quality Schemes.** A strong promotion strategy will be key to feed consumers' understanding of the overall characteristics of GI products.

The [Association of European Regions for Products of Origin \(AREPO\)](#) brings together 33 European regions and more than 700 associations of producers for over 50% of European GIs. AREPO aims to promote and defend the interests of producers and consumers in European regions committed to promoting quality agri-food products.

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⁷ FAO-oriGIn Forum on Contributing to SDGs through quality linked to geographical origin, "[Contribution of geographical indications to sustainable healthy diets](#)", [Background paper](#); FAO, 2021, [The nutrition and health potential of geographical indication foods](#), Rome