



Roadmap on the provision of food information to consumers

Facilitating healthier food choices – establishing nutrient profiles

EuroHealthNet's consultation input, January 2021

EuroHealthNet welcomes the EC's commitment to establishing harmonised mandatory front-of-pack (FOP) nutrition labelling and nutrient profiles in the context of the EU Farm to Fork Strategy. While recognising the complexity involved in doing so, we strongly support both initiatives as part of a comprehensive, ambitious, and truly transformative transition to European food systems. EuroHealthNet counsels however against a disproportionate focus on 'downstream' behaviour-change and lifestyle-oriented measures *alone* without a genuine appreciation of the underlying causes of poor nutritional choices, the socio-economic determinants. Issues of social fairness and deprivation, affordability, health- and digital literacy will be key in this transition.

The challenge of food insecurity and affordability risks growing during economic crises, making it a central theme in both the pandemic and economic recession recovery strategy. Any review of the regulatory actions needs to be carefully conceived against a set of health and social equity-linked indicators.

More than half of the adult and around a quarter to a third of the child population in Europe is overweight or obese¹. Levels are predicted to rise if people continue to over-consume highly processed foods, sugary drinks and adopt increasingly inactive lifestyles. Studies show that poor individuals are up to 20% more likely to be obese than their wealthier counterparts, and low education doubles one's risk of obesity².

While creating a 'healthy choice'-enabling environment, we cannot overlook structural inequalities in literacy, empowerment, and affluence levels. Highly processed foods (and sugary drinks) – widely considered to undermine public health goals for healthy nutrition - are relatively cheaper and easier to obtain in low-income communities than fresh, organic, and local produce and low disposable household income can direct families towards cheaper convenience foods of lower quality. Hence, it is key to address both the price, sustainability, the composition, and how the food (and drink, including alcohol) information is presented. On the latter aspect, it is clear that the current variation in labelling approaches between and within European countries is counterproductive. Given that initiatives that require a high level of personal agency are less likely to be adopted at a wide scale³, it is above all crucial that approaches taken are consistent, clear, and easy to understand. Using policies and regulatory action to this end (currently largely

¹ EC/OECD (2020). *Health at a Glance: Europe 2020. State of health in the EU cycle*.

https://ec.europa.eu/health/sites/health/files/state/docs/2020_healthatglance_rep_en.pdf

² OECD (2019). The heavy burden of obesity. The economics of prevention. <http://www.oecd.org/health/the-heavy-burden-of-obesity-67450d67-en.htm#:~:text=Almost%20one%20in%20four%20people,individuals%2C%20society%20and%20the%20economy.&text=The%20report%20makes%20the%20urgent,growing%20global%20public%20health%20problem.>

³ WHO Europe (2018). Health Evidence Network synthesis report 61: What is the evidence on the policy specifications, development processes and effectiveness of existing front-of-pack food labelling policies in the WHO European Region?

https://www.euro.who.int/_data/assets/pdf_file/0007/384460/Web-WHO-HEN-Report-61-on-FOPL.pdf

driven by voluntary self-regulatory and fragmented initiatives⁴) answers the [demands of Europeans for such supportive guidelines and labelling](#). For consistency and comprehensive approach not only food products should be considered, but also drinks, especially sugary and alcoholic drinks. The current review opportunity should also seize to address labelling of sustainable components of diets, as [expected by European citizens](#) (Eurobarometer, 2020).

After initial assessment of the options outlined in the Commission’s proposal on the FOP and nutritional profiles and following on our input to the EC’s consultation on the EU Farm to Fork Strategy⁵, EuroHealthNet submits the following insights:

- **Policy options for front-of-pack labels:** We recognise that it is not a straight-forward process to develop comprehensive profiles across very diverse categories of foods. The objective of doing so should remain, first and foremost, that of ensuring that European diets align more to national and international dietary recommendations.
The information must be easy to understand and apply by all; the more complex the information the harder it is for the general population to act on it. Hence – as also explained earlier - simple but well-conceived colour-coded schemes are most likely to work as long as they are understood at a glance and allow straightforward comparison between products. ‘Per portion size’ generalisations can be confusing and misleading and should be discouraged.
In order to **enhance uptake and the effectiveness of the profiles, especially in cross-border regions, rules should apply to all of the producer and retailer environment**, if possible. While recognising reformulation-readiness and financial imbalances within the food supply chain, support for smaller food retailers should be envisaged. This would also prevent a substitution effect where consumers shift to non-compliant markets. *Option 2* (nutrient-specific labels - colour-coded) and *option 4* (summary labels – graded indicators) are favoured since the latter also enables the introduction of sustainability component in the purchase decision.
- **Off-line vs. digital nutritional labelling:** Given that information and misinformation are increasingly transmitted digitally, this also calls for investments in improving digital literacy as well as insisting on information provision off-line (directly on the product and/or point of sale as much as possible). Aggressive advertising including in the digital sphere and often to socio-economically vulnerable consumers should be addressed in parallel to ensure coherence.
- **Policy options for date marking:** we encourage the EC to go beyond revising ‘best before/use by’ markings, potentially exploring *Option 3* in order to improve the expression and presentation of date information on food packaging. Whether it will be in terms of simplification or colour-coding again, efforts must be made to align the rules with the nutrition labelling rules, so as not to overwhelm consumers and dissuade them from applying the information.

⁴ WHO Europe (2018). Health Evidence Network synthesis report 61: What is the evidence on the policy specifications, development processes and effectiveness of existing front-of-pack food labelling policies in the WHO European Region?

https://www.euro.who.int/_data/assets/pdf_file/0007/384460/Web-WHO-HEN-Report-61-on-FOPL.pdf

⁵ EuroHealthNet (2020). Feedback to the EC Consultation on the Farm To Fork Strategy.

<https://eurohealthnet.eu/sites/eurohealthnet.eu/files/media/EuroHealthNet%20feedback%20on%20the%20EU%20Farm%20to%20Fork%20Strategy.pdf#overlay-context=>

- **Social and fundamental rights impacts:** Studies show that, although FOP labels help consumers to identify healthier products, their ability to nudge toward healthier choices may still be limited in absence of a wider supportive environment. Sustainable and healthy foods need to be affordable and convenient, as cost and time considerations remain key factors influencing the purchases of consumers, particularly those facing socio-economic vulnerabilities. It is therefore crucial to ensure measures like nutrition labelling are paired with other targeted measures to make healthy and sustainable products accessible and attractive to more vulnerable groups, to ensure such measures do not inadvertently widen health inequalities. It is also important to ensure that those in lower socio-economic groups are not ‘shamed’ for their unhealthy choices, which are often driven by very pertinent rationales.
- **Environmental impacts:** Integrating sustainability/green/climate claims components into the FOP and nutritional profiles, as well as the improved date marking rules, will help the green transition by an expected decrease in food waste and increased climate-related awareness with a potential ‘halo effect’ (see EuroHealthNet’s [feedback to the EC’s “Roadmap for Empowering the Consumer for the Green Transition”](#)).
- **Economic impacts:** We agree with the EC’s preliminary assessment of expected impacts. It will go a long way in creating a more level playing field between food business operators and encourage healthier and sustainable consumption and production, which would benefit the economy and society at large. Additional measures will however be needed to ensure that everyone, including more vulnerable populations also benefit, to strengthen the health impacts and ensure such measures contribute to a just transition to more sustainable economies.
- **Evidence base and data collection:** We recommend the evidence and data collection to widen its scope beyond the EC-oriented venues. But even here, some important research projects, Joint Actions of the EU Member States (e.g. A Healthy Diet for a Healthy Life - Coordination Action, CHRODIS+), and work of past cross-sector stakeholders’ platform should be considered more. This input includes some additional resources from WHO Europe, OECD, plus evidence from not-for-profit and academic research, which may widen the impact assessments’ scope. EuroHealthNet coordinated the Horizon 2020 project [INHERIT: INter-sectoral Health and Environment Research for InnovaTion](#) (2017-2019) that investigated policies and approaches that simultaneously restore the environment and benefit health and health equity. One of the three areas that it investigated was sustainable production and consumption, as it recommended making ‘healthy, sustainable food accessible, attractive and affordable for all’. How this can be done is set out in further detail in the INHERIT Policy Tool kit which includes specific case studies and evidence from across Europe on how this is being done. The Toolkit also includes a database of promising practice that comprises a range of initiatives from across the EU on sustainable, healthy and equitable food consumption. Of particular relevance, for example, is the Questionmark tool: [Questionmark – IT tools for consumers on the nutritional value and sustainability of products - INHERIT](#). Also, see: [Sustainable and healthy food - INHERIT](#)