

Facilitating healthier food choices – establishing nutrient profiles

EuroHealthNet’s vision contributing to the European Commission’s public consultation

EuroHealthNet welcomes the opportunity to contribute to this public consultation in a hope that our health equity-focused input will strengthen the legal provisions for Member States' disposal to improve their food systems. In laying out the vision for facilitating healthier food choices, EuroHealthNet aims to bring to the attention of the European Commission the importance of addressing the societal roots of nutritional health inequalities.

Changing food behaviours equitably will only be possible through tackling the systemic factors that determine people’s food choices along a social gradient, such as poverty and the level of socio-economic disadvantage. That is, unhealthy behaviours are not ‘just’ the result of individual and temporary choices, but they are influenced by societal and contextual factors. In a nutshell, the healthy choice must be the easy and default choice for all, especially for the most socio-economically vulnerable consumers.

EuroHealthNet has been focusing on implementing evidence-based policies and practice that promote good nutrition for all. In our work, we apply the proportionate universalism approach that balances targeted and universal population health perspectives through

action proportionate to needs and levels of disadvantage in a population. This approach is noticeable in our recent involvement in related Joint Actions such as [INHERIT](#) and [Best-ReMaP](#). For this reason, we welcome the fact that the European Commission takes further steps to facilitate healthier food choices by establishing nutrient profiles on food products.

For what concerns this consultation, making the healthy choice the easy choice entails adopting a systemic approach in all three decisions:

- 1. Favouring option 4 on Front-of-pack nutrition labelling and nutrient profiles:** especially as a matter of urgency on all Ultra-Processed Foods (UPFs) - considered contributing the most to unhealthy and unsustainable diets, leading to huge and growing NCDs burden, especially among children and lower SES population groups.¹

Some studies found that Nutri-Score FoPL can reduce by approximately 3.4% all deaths from diet-related non-communicable diseases². On top of that, comprehensive scores aided by colours – such as option 4 - are the most effective and simple to understand at all levels of literacy.³ This applies to the whole population, but especially for vulnerable groups, since Nutri-Score have the potential to encourage purchasing intentions of foods from higher nutritional quality among low-income individuals, compared with the label promoted by

¹ Rauber F, da Costa Louzada ML, Steele EM, Millett C, Monteiro CA, Levy RB. Ultra-Processed Food Consumption and Chronic Non-Communicable Diseases-Related Dietary Nutrient Profile in the UK (2008-2014). *Nutrients*. 2018 May 9;10(5):587. doi: 10.3390/nu10050587. PMID: 29747447; PMCID: PMC5986467.

² <https://ijbnpa.biomedcentral.com/track/pdf/10.1186/s12966-019-0817-2.pdf>

³ <https://ec.europa.eu/jrc/en/publication/eur-scientific-and-technical-research-reports/front-pack-nutritionlabelling-schemes-comprehensive-review>

food manufacturers.⁴ The procedure to obtain such ‘nutrient profiling’ scores is yet complicated, since it relies on algorithms to derive a consolidated score representing product’s overall nutritional profile. Information on individual nutrients is thus combined to obtain combined graded indicator schemes.⁵

That being so, we cannot expect consumers to have the time and knowledge to apply the “algorithm choice” to all purchases in their daily lives in order to determine whether the product they are buying is an A (good), B, C, D or E (bad). While still an improvement compared to the option 0, option 1-3 would still result too difficult to assimilate, especially for lower socio-economic groups.

EU bodies such as EFSA and JRC are already working to provide easily accessible information to consumers, so EU food legislation should follow and apply this work to create frameworks citizens’ rights to access healthy choice in the most accessible way are prioritised.

2. **Favour option 4 on ‘Origin Labelling’:** this is not only the healthiest option, but also the most sustainable one. Research proves that if the product is promoted as locally made, this has a positive influence on product choice.⁶ Hence, if labels clearly specify which products are local – and which parts if they are not all from the same location - and which instead are not, consumers’ decision to favour local products would be facilitated.
3. **Favour option 3 on simplifying date marking:** consumers are confused about the terminology used to describe the timing within which products can be consumed.

⁴ Egnell M, Boutron I, Péneau S, et al Randomised controlled trial in an experimental online supermarket testing the effects of front-of-pack nutrition labelling on food purchasing intentions in a low-income population *BMJ Open* 2021;11:e041196. doi: 10.1136/bmjopen-2020-041196

⁵ <https://www.who.int/nutrition/topics/profiling/en/>

For this reason, both option 2 and option 3 are worth exploring. As for nutritional labelling, a coloured information would yet be more likely to favour a reduction of food waste. Rather than complicated debates over the difference between “use by” or “best before”, it should be favoured a three stages system with a specific colour that clearly specifies when: i) product is at its optimal state; ii) product is going to expire, but still good to consume; iii) It is too late to consume. Above all, actions ought to focus on the phase ii), since making it clearer that products could still be eaten during this period would bring about the best results in terms of food waste.

To conclude, European citizens have the right to be properly informed about the products they are consuming, and information should be delivered to them in the easiest and most understandable way possible. Therefore, offering clear information on the Front package label would help consumers – especially vulnerable groups – making healthier choices in their food purchases, which would be a significant factor in reducing NCDs burden on European Society.