

EDA guiding principles on front-of-pack nutrition labelling schemes

EDA is committed to ensure accurate, useful and credible information to the EU consumers.

EDA would like to highlight that any front-of-pack nutrition labelling schemes discussed, developed or implemented within the EU should conform with key principles: be in line with dietary recommendations, ensure improved information to consumers about the overall nutritional quality of foods, take into account their long-recognised nutritional contribution and health benefits, as be always based on sound scientific evidence^{1,2}. The scheme should be voluntary and harmonised across the EU.

EDA thus recommends some guiding principles to evaluate any potential EU front-of-pack scheme with the objective of better informing the consumer and encouraging a healthy balanced diet.

- EDA is fully engaged on nutrition and health topics with policy-makers, industry groups and other stakeholders, in order to help make a positive impact on public health. We support the consumer's right – enshrined in the Food Information to Consumer Regulation (EU) No 1169/2011 – to be fully informed of the nutritional properties of foods.
- EDA believes that front-of-pack nutrition labelling schemes should remain voluntary in nature and be used in addition to the existing nutrition declaration, already required by the EU law.
- EDA is of the view that certain front-of-pack schemes are not suitable for all dairy products, given the specific nutrient contribution dairy makes to the diet.
- Moreover, such a scheme should only be introduced if they can be proven to show added value and have a positive impact on consumers' diets.
- Such a scheme, if there was to be one, could only be a useful additional tool for consumers if it fulfils a number of important criteria:

I. Be in line with dietary recommendations.

Food based dietary guidelines are the basis for many national food policies. In addition, these guidelines are used to communicate on the health effects of food to consumers. Therefore, front-of-pack nutrition labels should not contradict but be in line with the food based dietary guidelines.

¹ The [European School fruit, vegetable and Milk Scheme](#) continuously recognises the benefits of milk and dairy in a healthy and balanced diet.

² The [European Commission Joint Research Centre on-line Database of Food-Based Dietary Guidelines](#) in Europe: all EU countries recommend daily consumption of milk and dairy



A discrepancy between the message of the labels and the guidelines might confuse the consumer and lead to the loss of trust in both the guidelines and the labels. Furthermore, any of front-of-pack nutrition label must allow consumers to choose between and within categories and products in terms of the frequency/quantity required to achieve a balanced diet. In practice this means that the front-of-pack labelling system:

- Needs to take into account not only nutrients to limit but also nutrients to encourage. Both types of nutrients need to be considered to reflect the nutrient richness of foods (including dairy) and also to adequately fulfil the nutritional needs of the population.
- Needs to assure alignment with dietary recommendations including specific considerations for basic food categories such as dairy. Dairy products are complex foods that cross-category application may have difficulties to properly consider. Compared to many other foods, dairy products are naturally rich in macro and micro-nutrients, especially calcium, which should be recognised. The system must take into account the nutritional importance of each food group in the diet. For example, dairy products contain different types of saturated fatty acids with specific health effects and this should be considered. This could mean that for dairy the threshold for saturated fatty acids should be reduced accordingly when it is used as a criterion³.

2. Be helpful for the consumers to improve the nutritional quality of their food basket

A front-of-pack scheme should help consumers to better identify nutritional options within sub-categories of dairy products, therefore it should be sub-category specific. The scheme should provide the opportunity to help the consumer in making little steps towards better choices.

3. Be one voluntary and harmonised system for all EU

Food business operators should be able to decide if they want to put the logo on their products.

4. Be based on sound scientific evidence

Scientific substantiation of the front-of-pack scheme should be under independent scientific guidance. Any scheme should be accompanied with an educational program and be evaluated (ex-ante and ex-post after an evaluation period of x years) in order to check the consumer understanding and behaviour improvement regarding the place of the food in a balanced diet.

5. All relevant stakeholders should be involved in development and continuous improvement of the scheme

Only an endorsement of all interested parties will encourage the use of voluntary front-of-pack scheme. The governance of an EU wide voluntary front of pack scheme should lie with the European Commission.

6. Be credible and feasible

³Arnold, Christin & Jahreis, Gerhard. (2011). [Milk Fat and Health](#). Ernährungs Umschau. 58. 177-181

