

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:

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

1. 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.

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 (within sub-categories (of dairy products))

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.

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

ANNEX

EDA analysis of different front of pack nutrition schemes

Australian Health Star Rating



Description

- The Health Star Rating is a front-of-pack labelling system that rates the overall nutritional profile of packaged food and assigns it a rating from ½ a star to 5 stars. It provides a quick, easy, standard way to compare similar packaged foods (within similar product categories only). The more stars, the healthier the choice.
- It is based on the Nutrient Profiling Scoring Criterion, developed by Food Standards Australia New Zealand. The HSR takes into account negative aspects (energy, saturated fat, sodium and total sugars) and positive aspects (fruit and vegetable, dietary fibre and protein) of a food to give a final score.
- The HSRC splits foods into six separate categories, This starts with two major categories i.e. non-dairy food and dairy foods with three categories under each of them, where specific criteria (e.g. calcium content of the food product) is used to determine if a food product is classified as a dairy food. The nutrient profiling system used in the HSRC is consistent with the 2013 Australian Dietary Guidelines in that foods low in saturated fat, total sugars, sodium and/or energy are assigned higher star ratings than similar foods with an appreciably higher content of these nutrients; foods with a high fibre content are assigned a higher star rating than similar foods with an appreciably lower fibre content.
- In December 2019 Ministers of the Australia and New Zealand Ministerial Forum on Food Regulation (Forum) published their Response to the Health Star Rating (HSR) system five-year Review Report (Review Report) and its ten recommendations for enhancing the HSR system. In July this year the Forum agreed an approach for all outstanding matters, all relevant decisions can be viewed on the [Food Regulation website](#)
- The proposed timeframe for action is for changes to be implemented within two years from the agreed implementation start date of 15th November 2020.

Consistency with EDA Guiding Principles

Positives

- A number of studies have shown that the HSR is **aligned with Australian Dietary Guidelines (ADG)** and directs consumers towards foods lower in energy, saturated fat, sugar and sodium⁴ (EDA Principle 1).
- Outliers identified from this analysis, including yoghurts that were under-rated, are the basis of proposed changes to the HSR score which will reduce the HSR of 10% of foods (mostly discretionary foods) and increase the HSR of 6% (fruit and vegetables, yoghurts and soft cheeses).
- The HSR is intended for consumer to compare like with like products. It includes categories for non-dairy beverages, dairy beverages, foods, dairy foods, oils and spreads, and cheeses (EDA Principle 2).
- There are three categories for dairy foods; 1) milk and dairy beverages with sufficient calcium to make a source of claim, 2) other dairy foods and 3) cheese and processed cheese with calcium content above 320mg/100g. It therefore **allows distinction within the categories**. For example, cheeses have a variety of scores under HSR ranging from 0.5 to 5, allowing consumers to compare across the category. The majority of cheeses have scores of 3-5.

Negatives

- The 5-year review report notes that it cannot be fully expected to communicate all messages within the dietary guidelines, e.g. portion sizes, quantity or context within a person's overall diet⁵. However, a number of reviews have concluded that foods considered healthy by the ADG receive higher HSR scores than those considered less healthy (discretionary foods, foods to limit).

⁴ [Jones, A., Shahid, M. and Neal, B., 2018. Uptake of Australia's Health Star Rating system. *Nutrients*, 10\(8\), p.997](#)

⁵ [Health Star Rating System Five Year Review Report, 2019](#)

Nutri Score



Check out our [EDA Position Paper on NutriScore and cheese](#)

Description

The Nutri-Score system is a simplified colour-coded nutrition labelling scheme aiming at:

- Enabling consumers to evaluate the contribution of a food product to a healthy balanced diet in light of the food product's nutritional composition.
- Making clear the differences in nutritional compositions from one product to another.
- Nutri-Score is based on the UK Rayner / Ofcom nutrient profile model.
- The system ranges products from A-green (most healthy) to E-red (less healthy). It takes into account negative aspects (energy, saturated fat, sodium and total sugars) and positive aspects (fruit and vegetable, dietary fibre and protein) of a food to give a final score. Nutri-Score has specific calculations for beverages, foods (including milk), cheeses, and fats & oils.
- The Nutri-Score scheme is adopted in France, Belgium, Spain and Switzerland and in the process of being adopted by Germany, Luxembourg, the Netherlands.

Consistency with EDA Guiding Principles

Positives

- **Some scientific evidence indicates consumer understanding:**

Nutriscore is substantiated by some [scientific evaluation studies](#), that confirm consumer understanding of the logo and behaviours improvements.

- **Aligned with dietary guidelines for some categories – but not for cheese:**

Some studies show an alignment on Nutri-Score with food based dietary guidelines (FBDGs)⁶, this is however not the case for some dairy foods, such as cheese. While cheeses are an integral part of the dairy category recommended in all FBDGs, most of the cheeses fall under Nutri-Score D classification (see below).

⁶ Dréano-Trécant, L.; Egnell, M.; Hercberg, S.; Galan, P.; Soudon, J.; Fialon, M.; Touvier, M.; Kesse-Guyot, E.; Julia, C. Performance of the Front-of-Pack Nutrition Label Nutri-Score to Discriminate the Nutritional Quality of Foods Products: A Comparative Study across 8 European Countries. *Nutrients* 2020, 12, 1303 <https://www.mdpi.com/2072-6643/12/5/1303>

Negatives

Cheese

- **Need to better align Nutri-Score with dietary guidelines for dairy (EDA Principle 1):** EDA believes that Nutri-Score should be adjusted to better reflect the positive nutritional contribution cheeses make in a balanced diet and to allow more variety in Nutri-Score within the cheese category to better allow a fairer representation of the nutritional richness of cheese. Some amendments in protein points for cheeses could improve the score of this food category.

The dairy sector notes that even though the scheme takes into account some nutrients to encourage and nutrients to limit and seems therefore suitable for some food categories, and although there is a specific provision for cheese, it is inconsistent with the dietary recommendations for cheeses:

- Thanks to their natural nutrient richness (calcium, high quality milk proteins and many other nutrients), cheeses are included in the national dietary recommendations across the EU, either as part of the wider dairy food category or specifically as cheeses in some countries.
- The specific provision for cheese in the Nutri-Score⁷, is, in practice, insufficient to align with dietary recommendations, as **the link between calcium and proteins is only taken into consideration for products up to a quite low protein content (<8g/100g). 90% of cheeses have a protein content higher than 8g/100g** thus they cannot benefit efficiently from the specific cheese provision in Nutri-Score despite their high calcium content⁸. **As a result, most of the cheeses score D, which is not the appropriate score for a food that is recommended as part of a healthy diet.**
- In addition, the EU Nutrition and Health Claims Regulation 1924/2006, based on scientific evaluation, recognises the nutritional importance of high protein content of products. The nutrition claim „Contains protein“ is based on at least 12% of the energy coming from the protein, „High protein“ is based on at least 20% of the energy coming from the protein. This approach should also be reflected in the Nutri-Score.
- **No effectiveness regarding the nutritional quality of the food basket within the cheese category (EDA Principle 2).** For some food categories, the system allows the consumer to identify the best nutritional option, providing a wide range of choice from A to E, **but not for the cheese category. Nutri-Score does not help consumers to choose the “best” products within the category, as almost all cheeses are currently in category D.**

⁷ Current provision for cheese in the scientific Q&A from Sante Publique France: “Cheeses are included under the definition of dairy products, which should be consumed several times a day. The guidelines encourage consumers to take note of the amount of fat (to be avoided) and calcium (to be encouraged). There is a strong correlation between the protein and calcium content of dairy products (Rayner et coll. 2005). Calcium is not one of the nutrients subject to mandatory declaration. That is why the score modification consists solely of ensuring that the amount of protein in cheeses is always counted (which would otherwise be precluded by their salt, calorie and saturated fatty acid content, as these result in a total N value that exceeds 11). This ensures that their relative calcium content is accounted for.”

⁸ Calculations of more than 10000 cheeses based on OpenFoodFacts

- **Despite the wide variety of nutritional content within the cheese category, Nutri-Score provides almost no differentiation to help consumers improve their cheese basket.** In practice, independently of its fat, salt, protein or calcium (from 13 to 40% fat, from 0,1 to 2,5% salt, from 6 to 33 % proteins, from 90 to 1000 mg of Ca/ 100 g), most cheeses would score D.
- From the dairy perspective, the Nutri-Score needs to better reflect the dietary relevance of all dairy products particularly in relation to the nutritional richness of cheese.

In this context, there is a need for an adaptation that would improve the scoring of most cheeses, in order to:

- **Align it with national dietary recommendations (EDA Principle 1):** the richness of cheese, especially its calcium content, should be better reflected by the system. It should avoid risking a practice of category exclusion which could lead to a dietary imbalance of certain nutrients (e.g. calcium).
- **Enable a better differentiation of cheeses among Nutri-Score classes** (currently mostly limited to D or E categories) (EDA Principle 2): the best nutritional options (e.g. containing more calcium, less salt and fat) should be easily identified by consumer as a healthier choice.

Drinkable dairy 'arbitrary distinction between foods and beverages'

- Under Nutri-Score, some drinkable dairy products (e.g. fermented dairy drinks, probiotic drinks, flavoured milks) may be classified as 'beverages' instead of 'food', this is due to a decision to define an arbitrarily determined milk content (80%) stated in the Nutri-Score FAQ, with the intention of differentiating between 'beverages' (<80% of milk) and 'foods' (≥80% of milk).
- However, any rationale or data considered within that discussion has not been published or consulted on. An assessment of scientific publications and European definitions for "dairy products" shows that there is no consensus regarding a minimum percentage of 80% of milk⁹, which the technical Q&A acknowledges was defined through expert consensus.
- The only binding reference defining milk products at the EU level is the EU Regulation 1308/2013¹⁰ which says that *the term 'milk' and the designations used for milk products may also be used in association with a word or words to designate composite products of which no part takes or is intended to take the place of any milk constituent and of which milk or a milk product is an essential part either in terms of quantity or for characterisation of the product*¹¹. This shows that the current EU legislation does not define a specific threshold for drinkable dairy products but highlights that milk should be 'an essential part' of the dairy product. We conclude that the 80% milk threshold as proposed in the technical Q&A on Nutri-Score is not sufficiently substantiated (not in line with EDA Principle 4).

⁹ A few varied recommendations exist at national industry level

¹⁰ <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1599052846294&uri=CELEX:32013R1308>

¹¹ Internationally these elements are present in the Codex General Standard for the use of dairy terms (CODEX STAN 206-1999) which defines: « *Composite milk product is a product of which the milk, milk products or milk constituents are an essential part in terms of quantity in the final product, as consumed provided that the constituents not derived from milk are not intended to take the place in part or in whole of any milk constituent.* »

- The algorithm for beverages is much stricter than for solid foods. This results in disproportionately low scores for drinkable dairy products that are below the arbitrary 80% threshold compared to any other products, which are classified as 'foods'. This could distort the intended objective of the scheme, mislead consumers and lead to competitive disadvantage with regards to the nutritional quality of drinkable dairy products (not in line with EDA Principle 2).
- In addition to specifying that "milk must be an essential part either in terms of quantity or for characterization of the product", the term "milk" must also include "milk products" (e.g. retentate, permeate, buttermilk, whey etc.), as already foreseen by EU Regulation 1308/2013 (see bullet point 3 above). This would take into account their nutritional value. This point should be clarified in the official Q&A
- We would like to note that within Food Based Dietary Guidelines, drinkable milk products are included in the food category as these products are not consumed as beverages (i.e. to quench thirst or for hydration purposes). Therefore, "dairy products such as milk, drinkable dairy, flavoured or not" should not be considered as beverages for the purpose of calculating the Nutri-Score. Otherwise, as previously mentioned, this could mislead the consumers as to the true nutritional quality of these products (not in line with EDA Principle 1).
- In addition, in the Nutri-Score FAQ, "dairy products" are the only food group split into a food or beverage category based on a devised threshold of raw material content. This is a clear and marked inconsistency between the 80% milk threshold required for drinkable dairy products, and a complete absence of such a threshold for any other food categories which could be seen as misleading to consumers and unfair competition.
- To conclude, the 80% threshold of milk content currently required for drinkable dairy products to be categorised as 'foods' is not appropriate; it is not supported by science or existing definitions. It is also unfair from a competitiveness point of view as no other food categories have the burden of a devised raw material threshold. As a consequence, it does not recognise the nutritional quality of drinkable dairy products which can mislead the consumer.

Italian NutrInform System



Description

- The Italian NutrInform system aims at making easier for the consumer to understand the extent to which the portion of food to be consumed contributes to their energy needs and other nutrients to which particular attention must be paid (fats, saturated fats, sugars and salt).
- The charged part of the battery represents the percentage of energy or nutrients contained in the single portion, in relation to the contribution to the daily needs of a reference adult.
- Operators have committed themselves to define the ranges of portions for each product category, based on the available scientific evidence.
- The scheme is applied on a voluntary level by the food business operators.
- The system is not expected to be adopted by products bearing EU quality schemes (such as Protected designation of origin (PDO), Protected geographical indication (PGI) or Traditional Specialty Guaranteed (TSG)). The rationale behind is that adding another, nutritional logo, even if optional, alongside the quality label of PDO, PGI and TSG products could make the EU quality schemes logos less distinctive for consumers.

Consistency with EDA Guiding Principles

Positives

- Allows consumers to identify better nutritional options within sub-categories regarding specific nutrients to limit (EDA Principle 2).

Negatives

- The system does not take into account positive nutrients such as calcium and/or protein

Additional remarks

- PDO, PGI, TSG products are excluded.
- Based on portions sizes
- Italian Food Business Operators and nutritionists are working on the definition of portions - as defined in the Italian dietary Guidelines - and applicable rules.

Nordic Keyhole scheme



Description

- The Nordic Keyhole scheme used in Denmark, Sweden, Norway and Iceland is a voluntary FOPL. The Nordic Keyhole enables the consumer to discriminate between food in specific categories. The scheme can only be applied if the product complies to one or more of the following criteria for the product: less fat, less sugar, less salt and more fibres. The aim of the Keyhole is to give the consumer the opportunity to make the healthiest choice from a nutrition perspective for which product to choose in specific categories.
- The Nordic Keyhole scheme is a health claim and thus in compliance with EU Nutrition and Health Claim Regulation (1924/2006). It is applicable to 33 food groups and is based on the Nordic Nutrition Recommendations.¹² Products with added sweeteners and infant formulas cannot apply the scheme.^{13 14}

Consistency with EDA Guiding Principles

Positives

- In line with Scandinavian dietary guidelines (EDA Principle 1)
- Enables to discriminate between food in specific categories (EDA Principle 2)
- Consistent with EU Claims Regulation (EDA Principle 4)
- It is a voluntary positive system: products not fulfilling the criteria are not discriminated – they do not have a negative score. Products with Keyhole are ‘the better choice’ within the category (EDA Principles 1, 2)

Negatives

- Many food categories are excluded from the scheme
- The very strict criteria make reformulation impossible for many products

¹² <https://altomkost.dk/english/#c41068>

¹³ <https://www.retsinformation.dk/Forms/R0710.aspx?id=209816>, §5

¹⁴ Criteria for dairy products <https://www.retsinformation.dk/Forms/R0710.aspx?id=209816>, 11 a), 12 a), 13 a), 14 a), 15 a), 16, 18

- For milk and fermented products intended for drinking and without added flavour the product cannot exceed fat 0.7 g/100 g.
- Fermented products not intended for drinking and without added flavour cannot exceed fat 1.5 g/100 g. Fermented products not intended for drinking with added flavour cannot exceed fat 1,5 g/100 g and added sugars 4 g/100 g.
- For products consisting of a combination of milk and cream with the same field of application as cream and fermented products alike that does not contain added flavour cannot exceed fat 5 g/100 g. Products consisting of a combination of milk and cream with the same field of application as cream and fermented products alike that does contain added flavour cannot exceed fat 5 g/100 g, sugars 5 g/100 g and salt 0.8 g/100 g.
- Cheese products, not including fresh cheese, cannot exceed fat 17 g/100 g and salt 1.6 g/100 g. Fresh cheese and products alike cannot exceed fat 5 g/100 g, added sugars 1 g/100 g and salt 0.9 g/100 g

Finnish Heart Symbol



Description

The criteria for the symbol are based on the Finnish nutrition recommendations. In all, the criteria are defined for nine main food groups¹⁵ that may further be divided into subgroups.

The Heart Symbol aims at telling the consumer at a glance that the product marked with this symbol is a better choice in its product group regarding fat (quantity and quality) and sodium. In some product groups, also sugar and fibre contents are taken into account.

The Heart Symbol has been notified as a nutritional claim.

Consistency with EDA Guiding Principles

Positives

- It is based on Finnish nutritional recommendations; milk products are part of recommendations; dairy is one of the “nine main food groups” (EDA Principle 1)
- It allows to choose a healthier option within the dairy category without discriminating the less healthy option (EDA Principle 2)
- Consistent with EU Claims Regulation (EDA Principle 4)
- Moreover, the scheme enjoys a very high level of brand awareness by the consumers in Finland. Due to the continuous and systematic development and communication Heart Symbol is very well-known (90 %), highly valued and widely used and recommended among Finnish consumers. Based on the study by Raulio et al (2017)¹⁶, using products with complying criteria helps meeting nutrition recommendations.

Negatives

- Many food categories are excluded from the scheme
- The very strict criteria make reformulation impossible for many products

¹⁵ Heart symbol criteria for milk products: <https://www.sydanmerkki.fi/en/criteria/milk-and-dairy-products/>

¹⁶ Raulio S et al. Nutrition Health Food Sci 2017; 5(1):1-7.

The table below represents how EDA Guiding Principles on FOP are reflected in different FOP schemes. The analysis is done from the perspective of dairy categories. It should be considered as an analysis and not an EDA endorsement of any of the existing systems.

Overview Table 1. Reflection of EDA guiding principles in different front-of-pack nutrition labelling schemes

	Australian Health Star Rating 	NutriScore 	Italian NutrInform Battery 	Nordic Keyhole 	Finnish Heart Symbol 
1. Be in line with dietary recommendations (for dairy)	+++	+/- (depending on product categories, e.g. not aligned for cheese)	N/A (descriptive system)	+++	+++
2. Be helpful for the consumers to improve the nutritional quality of their food basket (within sub-categories (of dairy products))	++	++ for fresh dairy --- for cheese	+	++	++
3. Be one voluntary and harmonised system for all EU	The FOP scheme should be harmonised across the EU in order to ensure the functioning of the EU Single Market for food, including milk and dairy products. The scheme should remain voluntary and food business operators should be able to decide if they wish to put the FOP logo on their products. See EDA Position against mandatory FOP .				
4. Be based on sound scientific evidence	see below ¹⁷	see below ¹⁸	see below ¹⁹	see below ²⁰	see below ²¹
5. All relevant stakeholders should be involved in development and continuous improvement of the scheme	++	+/-	++	++	++

¹⁷ <http://www.healthstarrating.gov.au/internet/healthstarrating/publishing.nsf/Content/formative-research>

¹⁸ <https://solidarites-sante.gouv.fr/prevention-en-sante/preserver-sa-sante/nutrition/article/articles-scientifiques-et-documents-publies-relatifs-au-nutri-score>

¹⁹ Studies exist but are not yet publicly available

²⁰ [Danish Technical University 2015](#)

²¹ [Raulio S et al. Nutrition Health Food Sci 2017; 5\(1\):1-7.](#)