



Position paper

February 2023

EDA Position Paper on Front-of-pack nutrition labelling

EDA is committed to ensuring accurate, useful, and credible information to EU consumers. In doing so, EDA fully supports the consumer's right – enshrined in the Food Information to Consumers Regulation (EU) No 1169/2011 – to be fully informed of the nutritional properties of the foods they consume.

EDA would like to emphasize that any **front-of-pack nutrition labelling (FOPNL) scheme** discussed, developed, or implemented within the EU should conform to the following key principles:

- ✓ Its application should be **voluntary and harmonised across the EU**
- ✓ The scheme should be **in line with food-based dietary guidelines** and consider essential nutrients (e.g. calcium) and basic food groups (such as milk and dairy products)
- ✓ It should **provide improved and correct information to consumers** about the overall nutrient composition of foods in a sub-category-specific manner, considering the frequency and quantity required to achieve a balanced diet
- ✓ The criteria should be **based on sound scientific evidence** and be regularly monitored to ensure correct implementation and evaluation of the actual impact on consumer health.

The EU Farm to Fork Strategy aims at improving people's health by allowing consumers to make educated, informed, and healthy choices for their diets. **The European dairy sector is fully supportive of the achievement of these objectives.** In the context of the revision of the Food Information to Consumer Regulation (EU) No 1169/2011 (FIC), the EU Commission foresees an EU harmonised front-of-pack nutrition labelling scheme. EDA calls upon the EU policy makers to consider this position paper for the evaluation and development of a potential EU FOPNL scheme with the objective of helping consumers in making well-informed and healthier food choices.



Voluntary and harmonised scheme across the EU

EDA calls for a voluntary EU harmonised scheme that can be used in addition to the existing nutrition declaration, already required by EU law to guarantee the proper functioning of the EU Single Market for all foods, including milk and dairy products. Food business operators should be able to decide whether they wish to put the logo on their products or not.

In line with food-based dietary guidelines

Food-based dietary guidelines (FBDGs) are the basis for many national food policies and represent the scientific consensus of healthy eating. In addition, these guidelines are used to communicate the health benefits of foods to consumers and the frequency/quantity of each food (sub-)category required to achieve a balanced diet. Therefore, a FOPNL scheme must not contradict these messages that are used to communicate the health benefits of foods to consumers, but instead support the consumer in “translating” these guidelines to the food they buy.

A discrepancy between FOPNL and FBDGs risk to confuse the consumer and result in the loss of trust in both the guidelines and the labels. In practice, this means that the FOPNL scheme:

- Must take into account the total nutritional content of the food, including beneficial nutrients (e.g., proteins, fibres, vitamins and minerals) to reflect the overall nutrient richness of foods (including dairy) and to adequately fulfil the nutritional needs of the population¹.
- Must be aligned with dietary recommendations, including specific considerations for basic food categories such as dairy, remembering that health benefits are linked to the consumption of whole foods and not just nutrients in isolation². Dairy products are complex foods with unique richness in macro- and micronutrients that cross-category application may have difficulties to properly portray. Examples of specific dairy considerations are:
 - ✓ dairy calcium content which should be appropriately recognised and taken into account.
 - ✓ different types of saturated fatty acids with specific health effects³.

EDA is of the view that none of the existing FOPNL schemes is fully in line with FBDGs principles nor suitable for all dairy categories. They do not consider the enormous nutrient contribution of dairy products to a healthy and balanced diet. This especially concerns cheeses which are part of the national dietary recommendations across the EU, either as part of the wider dairy food category or specifically as a cheese category in some countries.⁴

¹ [EDA factsheet: Daily dairy recommendation - are we eating enough dairy?](#)

² [EDA factsheet - Dairy foods are more than just nutrients](#)

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

⁴ See detailed EDA position in the [Annex of the “EDA analysis of different front of pack nutrition schemes”](#)



Helpful for the consumers to improve the nutritional quality of their food basket

A FOPNL scheme should help consumers to better identify nutritional options within sub-categories of dairy products, taking into account that no size fits all. Making an adequate distinction between individual food categories (e.g., dairy) and subcategories (e.g., yoghurt and cheese) would secure a more relevant nutritional evaluation of the specific product by considering also the inherent properties of different food groups. Furthermore, differentiating products on a category level would also allow the inclusion of beneficial nutrients relevant for that specific food group e.g., protein, calcium and vitamin B12 for dairy products, fibre for cereal products, etc. Establishing a general classification system independent of food categories is neither meaningful nor helpful for healthier food choices.

Against this background, we believe that any FOPNL scheme should be sub-category specific. Only then, consumers might be able to choose within a product category in terms of the frequency/quantity required to achieve a balanced diet. For example, the nutritional diversity of cheeses should be reflected appropriately in the different FOPNL schemes, which is not currently the case, even for the schemes that have specific provisions for this category. The FOPNL scheme should provide the opportunity to help the consumer in making healthier choices and should only be introduced if the added value is proven in the context of a positive impact on consumers' diets and, consequently, health status improvement.

EDA is of the view that some of the schemes currently envisaged do not help consumers in choosing the best options, especially in the cheese category.⁴

Based on sound scientific evidence

EDA considers that any scheme that is intended to support consumers in making better and healthier food choices should be based on sound scientific evidence and regularly monitored evidence, based on real life conditions and not limited to experimental approaches to evaluate its real impact on consumer health. It should be supported by EU-wide education programmes ensuring consumer understanding. Once adopted, regular reviews should be undertaken to ensure that the scheme is supporting consumers in making well-informed and healthier food choices in line with the FBDGs.