



# Better Food Information for better Health of Humans and the Planet

## Key Points

- Healthy eating saves lives – information on food is key for healthy choices.
- Nutrition is a complex issue, nutrients and ingredients lists as well. **Nutriscore** translates complexity into a simple scheme. Science shows, Nutriscore works. It enables and encourages all consumers including those most in need to make healthier choices.
- Sweets for healthy teeth? No joke. This advertising reality needs to be changed. **Nutrient profiles** shall guide what can be advertised as “healthy” and to children.
- No more secrets. **Alcohol should be labeled like food**. Not displaying ingredients and nutrients on alcoholic beverages is neither science based nor consumer friendly.
- Nobody answers the question “where do you come from” with “EU” or “non-EU”. Neither should food. Adapting current rules of **origin labeling** is a matter of cause to meet consumers’ demands.
- **Clear date marking** can reduce food waste. A fixed place on packs can help too.
- Modern Europe is digital but all mandatory **food information must appear on packaging**. Outsourcing some elements to websites excludes a significant proportion of consumers from being accurately informed.
- More and more products claim to be “green” somehow, but rules for communicating positive environmental, climate, biodiversity or animal welfare effects are missing. Europe needs a **“green claims on food” regulation** to guarantee honest consumer information and nudge better production.

## Background

The Farm to Fork Strategy, the EU’s blueprint for sustainable food and farming, foresees – inter alia – an upgrade of food labeling rules to empower consumers to make healthy and sustainable food choices and consequently influencing current unfavorable eating habits of Europeans to the better for the sake of their own health and that of the planet.

Key action is a revision of the [Food Information to Consumers Regulation](#) (FIC) considering other EU Strategies like Europe’s Beating Cancer Plan, the need to stop rising childhood obesity rates in all Member States or the aim to reduce food waste. A [public consultation](#) for a revision of the FIC Regulation ended on 7 March 2022 and covered **front-of-pack nutrition labeling, nutrient profiles** to restrict nutrition and health claims, **origin labeling, alcohol labeling** and **date marking**. The Commission’s draft is expected to be published in the fourth quarter of 2022.

A fair transition of the EU food system and archiving health and sustainability goals needs the involvement of consumers on a level playing field. Therefore food labeling must be clear, easy to understand and useful for consumers as well as reliable and harmonized throughout the EU. All action must be science-based and government lead as self-regulation proved not to work properly.

## Main Findings

### Mandatory Nutriscore works best for consumers

In the European Union [one in two adults](#) is overweight or obese. [Europeans eat too much](#) saturated fats, salt and sugar, and too little fruit, vegetables and whole grains. Excess weight and

poor diets increase the risk for noncommunicable diseases (NCDs) such as diabetes and cancer. Health organizations regard a simple front-of-pack nutrition label (FOPNL) a key tool in the battle against obesity and NCDs. Studies have shown that consumers – especially those with lower education levels amongst which NCD-levels are the highest – are struggling to understand and use the nutrition declaration as it is today, often written in tiny fonts and poorly standardized. As decisions, what to buy are made within seconds a simple FOPNL helps all consumers to make healthy choices. Nutriscore has been proven to work best for consumers including for low-income households and should be made mandatory on all food products. The nutrition declaration on the other hand helps consumers to plan their daily or weekly nutrition. Both is necessary, Nutriscore on front and nutrition declaration on back of packs for which a fixed format (e.g. table) would further increase its usability.

Nutriscore is science based, conducted free from commercial interests and already in use in some Member States and by many companies. It is aligned with dietary recommendations and an efficient tool to encourage consumers to decrease portion sizes of less healthy products. Large studies in several European countries (see page 4: Literature) have shown that consumption of products with less favourable Nutriscore ratings is associated with a higher mortality, cancer, circulatory, respiratory and digestive diseases. Additionally, Nutriscore on all food packs can nudge producers to adapt their recipes, although reformulation is not the purpose of food labeling.

**Nutrient profiles stop sloppy health marketing and unhealthy food marketing to children**

The [EU Health Claims Regulation](#) foresees nutrient profiles to restrict the use of nutrition and health claims. Profiles should have been set by 2009 but are still missing. Products high in fat, sugar and/or salt can still bear claims giving them a “healthy” appearance (e.g. “high in fibre”, “vitamin D for healthy bones”). Nutrient profiles work like filters, they

prevent positive health messages on products with unfavorable nutritional composition. This is crucial in times when diet-related diseases persist at high levels across the EU and consumers are increasingly interested in buying healthy food. Profiles must be based on robust evidence related to diet and health, and consistent with other policies and instruments (e.g. FOPNL). Profiles must apply for all food and drinks. Any derogation, if at all necessary, must base upon science not commercial interests.

In addition, nutrient profiles for **marketing food to children** are needed that reflect the nutritional needs and vulnerability of youngsters. Marketing must not encourage kids to eat unhealthily as many of them already have weight problems and/or unbalanced diets. In a perfect world, only food and drinks recommended to be consumed by children should be allowed to be advertised to them, meaning that whole categories are excluded. Restricting marketing to kids has been shown to work best if embedded in a mix of measures (reformulation, availability and affordability of better products, school food initiatives, and education).

**Consumers have the right to know – no matter if food or alcoholic beverage**

All prepacked products except alcoholic drinks need an ingredients list and a nutrition declaration. The lack of information on alcoholic beverages is outdated and unacceptable from a consumer perspective. The European Commission concluded already in 2017 that there are no sound reasons for the exemption. To combat overweight and obesity consumers should be made aware of the (high) energy content of alcoholic drinks. The full information on nutrients and ingredients is important though, as the composition of alcoholic drinks can vary considerably. Some can contain high levels of sugar whilst others (e.g. popular cream liqueurs) contain significant amounts of fat. To be consistent, consumers should get the same information in the same way as for nonalcoholic drinks. Digital tools can complement but must not replace any mandatory item on packs.



Figure 1: The 5 possible appearances of Nutriscore

Source: Santé publique France

## Consumers deserve more transparency on where food comes from

There is a long-standing consumer demand for more transparency on food origin while mandatory origin labeling is limited to only a few categories of food (fresh/frozen unprocessed beef/pig/poultry/sheep/goat meat including minced meat included; fresh/frozen fishery products including salted and/or smoked, fresh fruit and vegetables, olive oil, honey, fresh eggs).

There are different reasons behind consumers' interest in the origin of food. Some relate origin to safety and quality, others to environmental or animal welfare advantages, some want to support the local economy and many just want to know the origin for the sake of transparency. No matter the reason, most consumers want to know the specific country, as only a minority (10%) is satisfied with "EU/non-EU". Consumers are particularly interested in the origin of meat, fish, milk, fruit and vegetables, whether fresh or as an ingredient in processed food and from individual ingredients (e.g. sugar, salt, flour). Expansion of original labeling shall follow consumer demand. Modalities must consider consumers expectations on what "origin" refers to (place of farming vs. country of last substantial processing). For processed food, whether of animal or plant origin, surveys show that most consumers like to know both the country of origin of the primary ingredient(s) and the country where the food was manufactured. Country level information must be the norm, indicating at least the state of farming (animal) or harvesting (plants). Current loopholes must be closed (all meat, fresh/processed) and rules expanded to milk and processed products with meat, milk and eggs as primary ingredient as some countries have already tried on national level but could not implement due to harmonized rules. Everything that is reasonably possible should be realized. A declaration on the form of animal keeping e.g. similar to what is established for eggs (0/1/2/3, organic/free range/barn/cage) would be a benefit allowing consumers to make animal friendlier choices. Animal welfare labeling is a future challenge.

To be consistent, the derogation from labeling the origin of a primary ingredient for food with a protected geographical indication must be canceled. It is unfair and irritating for consumers, that "Waldviertler Speck", containing meat from Slovakia, must disclose "meat from Slovakia" on the pack whereas "Tiroler Speck (PGI)" needs not, although containing meat from Denmark.

## No rash experiments with date marking

Prepacked food needs an expiration date ("use by", after the date products are not safe to eat, selling is forbidden) or a minimum durability date ("best before", after the date products are still safe to eat but can have

quality deviations, selling is allowed with a hint that the product has passed the date but is safe to eat). There is some evidence, that especially "best before" is not perfectly understood by consumers and changes could lead to less food waste although the biggest parts of food waste in private households are food without a date mark (fruits, vegetables, bread, unpacked ham/cheese). In fact, dates are often difficult to find on packs or hard to read. Consumers' inability to easily access this information can hinder efforts to make it more understandable. Surveys show that consumers prefer to have date (numbers) and "use by"/"best before" side by side, standardized in format and with storage information in the same field of vision. New wordings or text-symbol-mixes however shall be backed by sound consumer science and must not restrict consumer rights to get a claimed quality or to knowingly buy a product after the "best before" date. Extending the list of exemptions for providing a „best before" date to avoid food waste needs more science to back it.

## All mandatory and necessary information must be on packs

The pack is the place for all necessary information to enable informed choices. Shifting information to websites would exclude a significant part of consumers from accessing it. In 2021, 8% of [adult Europeans stated](#) they have never used the internet, and 27% have not used a mobile device to connect to the internet. Digital information requires that consumers bring their devices to shops, devices are charged and connections work. But none of this can be taken for granted. In addition, data protection concerns are obvious. Requiring consumers to scan items or visit a website allows traders to collect (potential) purchasing patterns and other personal data. Furthermore, online information is much harder to monitor by food inspectors.

## Regulate green claims

More and more food bears "green claims" in the widest sense without a declaration on what ground this claim is made. Harmonized definitions of terms like "local", "climate friendly" or "carbon-neutral" are missing as well as fixed methods for calculating different forms of sustainability. Regulating green claims in the style of nutrition and health claims seems necessary to clear the market and guarantee solid consumer information. Basic sustainability claims need harmonization so all EU consumers can count on the same standards for "local" or "climate-friendly" (as the Health Claims Regulation did it for "light" or "high in Vitamin C"). Specific claims should only be permitted after a positive evaluation by an EU-Agency. Reliable green claims can accelerate innovation and help achieving sustainability goals if based upon science, not marketing.

## Demands

To improve food information to consumers, AK calls for a broad range of measures:

- Make **Nutriscore mandatory** on all food and drinks on the EU Market (see figure 1)
- **Set nutrient profiles** for food with nutrition and health claims as well as for food marketing to kids
- Make nutrition and ingredients **information mandatory for alcoholic beverages**
- Expand **mandatory origin labeling** to more food categories and cancel derogations for food with protected geographical indications
- Establish harmonized **Animal Welfare Labeling**
- Display the description (e.g. best before) and the date always side by side and together with storage

information on a fixed place on the packs; new wordings and/or new text-symbol-combination of date information should be tested in consumer studies before the rules are changed

- All mandatory **information** must appear **on the package**, digital information excludes a significant proportion of consumers of being adequately informed
- **Regulate** the use of “**green claims**” to properly protect consumers from misleading claims and sloppy sustainability information on food

All initiatives to improve food labelling are just **one part** to fight unhealthy eating habits and achieve more sustainable consumption patterns. Consumers need support by a **broad set of interventions** to address the “food environment”. No single policy intervention can be considered as a “silver bullet”.

## Literature

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