



15/09/2021

REMARKS OF FENAVIAN FOR AMENDMENTS OF THE NUTRI-SCORE ALGORITHM

Below, you can find our most important remarks.

- 1. For meat and its derivatives, as with cheese, the positive protein score should always be included in the calculations of the Nutri-Score without imposing additional conditions (such as a maximum negative score or a minimum score for the content of fruit, vegetables, legumes, nuts and rapeseed, walnut and olive oil)**

For the calculation of the Nutri-Score of food products in general (including meat and its derivatives), the positive protein score is currently not taken into account if the product scores more than 11 negative points and less than 5 positive points for % 'fruit, vegetables, legumes, nuts and rapeseed, walnut and olive oil' (the latter means that the product contains less than 80% of these components). An exception has already been made for cheese. Besides being an important source of protein, cheese is also an important source of calcium. Calcium, however, is not included in the calculation of the Nutri-Score. By counting the positive protein score, regardless of the number of negative points, the relative calcium content is also taken into account.

A similar argument can be made for meat and its derivatives. Meat is not only an important source of high-quality protein (that is easily digestible, has an excellent amino acid balance and is almost always of higher quality than vegetable protein), but it is also rich in heme iron. This heme iron is significantly better absorbed during consumption than non-heme iron from plant sources. Moreover, combining meat with plant sources ensures a better absorption of the non-heme iron from those plant sources. Sufficient iron intake through the diet is essential, since iron deficiency is considered one of the main nutritional deficiency disorders in Europe. It causes, among other things, anemia and affects large parts of the population, especially children, menstruating women and pregnant women. Vegetarians and vegans are also at a higher risk for iron deficiency, which further confirms the importance of meat as a source of iron¹. Meat is also an excellent source of vitamin B12, which naturally occurs only in animal products. This should also be taken into account, since vitamin B12 deficiencies lead to anemia and neurological disorders². Furthermore, meat is also an important source of other vitamins (such as other B vitamins and vitamin D) and minerals (such as zinc, selenium and phosphorus). Finally, one should not forget that (lean) meat has a very high protein/calorie ratio. All this makes meat a nutrient-dense food source that fits into a healthy and balanced diet. Meat can play an important role, especially for children, adolescents and the elderly, who, according to the dietary reference values published by the EFSA, require higher protein intakes. Its consumption should therefore not be discouraged.

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¹ Hercberg S, Preziosi P, Galan P. Iron deficiency in Europe. Public Health Nutr. 2001 Apr;4(2B):537-45. doi: 10.1079/phn2001139. PMID: 11683548.

² Ralapanawa, D. M., Jayawickreme, K. P., Ekanayake, E. M., & Jayalath, W. A. (2015). B12 deficiency with neurological manifestations in the absence of anaemia. BMC research notes, 8, 458. <https://doi.org/10.1186/s13104-015-1437-9>

By not including meat and its derivatives as exceptions with regard to the positive protein score, the negative properties are taken into account much more than the important positive properties. This way, meat and its derivatives are penalized because they do not contain enough vegetables, fruits, etc., but it is not taken into account that meat and its derivatives are almost never consumed on their own, but in combination with a source of carbohydrates (potatoes, rice, etc.) and/or vegetables.

We would therefore urge that for meat and derivatives, as with cheese, the positive protein score is always included, regardless of the amount of negative points or the amount of other components (vegetables, fruit,...). This way, not only the contribution of meat (and derivatives) as a source of high-quality protein is taken into account, but also the contribution as a source of many other important nutrients.

2. The Nutri-Score currently does not take into account micronutrients (vitamins and minerals), quality of proteins, the presence of bioactive components (antioxidants, cardioprotectives,...) and the absence of, for example, harmful trans fats.

As mentioned above, meat is an important source of much more than just (high-quality) protein. The fatty acid profile of pork and meat products, for example, is also in line with the balanced profile recommended for a healthy diet. It contains 42.9% monounsaturated fatty acids, 15.9% polyunsaturated fatty acids and 34% saturated fatty acids. The main fatty acid in pork is oleic acid, which is an unsaturated fatty acid that contributes to lowering bad cholesterol (LDL) and maintaining or even increasing good cholesterol (HDL).

The Nutri-Score would therefore do well to take these additional factors into account, certainly if no exception would be made for meat with regard to including the positive protein score in the Nutri-Score calculation (see point 1). For the assessment of the protein quality, for example, the DIAAS score could be used.

3. The Nutri-Score is expressed in g/100 g, but this does not reflect the actually consumed portion size.

The Nutri-Score does not take into account the portion sizes of products, resulting in a possible over- or underestimation of the impact of the products on consumer health. For example, the Nutri-Score is calculated on the basis of g/100 g, whereas for meat products only a portion of 30 g is recommended on the packaging. It is therefore necessary to define a harmonized definition of portion sizes for meat and derivatives that corresponds to actually consumed portion sizes and to take this into account in the determination of the Nutri-Score.

By not taking into account the actually consumed portion sizes and by assessing meat individually, while in reality it is (almost) always consumed in combination with other foodstuffs (e.g. a source of carbohydrates and/or vegetables), the Nutri-Score gives a distorted picture. In this way, meat on its own gets a less favorable assessment, while in combination with, for example, potatoes and vegetables (as in a ready meal) it gets a more favorable assessment. And this despite the fact that individually purchased meat will, in practice, also be combined with other foodstuffs by the consumer at home.

4. The calculation of the Nutri-Score currently involves using criteria that are not available on the nutrition label of the products. Calculations solely based on the nutrition label (by certain smartphone applications, for example) can therefore be misleading.

Currently, the calculation of the Nutri-Score requires not only the nutritional information on the product label, but also compositional information, such as the content of 'fruit, vegetables, legumes, nuts and rapeseed, walnut and olive oils'. The Nutri-Score can only be calculated accurately if one has all the necessary data. Currently, however, there are already many applications (e.g. on retail websites or smartphone applications such as Yuka, INNIT,...) where the Nutri-Score is calculated based on the nutritional values on the label and thus without having all the necessary information. This can therefore be misleading and give inaccurate information. It is therefore important that the Nutri-Score should only be displayed by players who have all the necessary data.

5. Regardless of the algorithm, we think it should be communicated more clearly that Nutri-Score should only be used to compare products within the same product range

The Nutri-Score is a good tool to compare different products within the same product range. However, it should not be used to compare products from completely different categories. For example, the Nutri-Score can be useful to compare different soft drinks with each other (whereby soft drinks with less sugar will have a more favorable Nutri-Score), but it should not be used to compare a (light) soft drink with a meat product, for example, which is what is happening today. In the latter case, a light soft drink would possibly score better than a meat product, while the meat product still contains important nutrients in contrast to the light soft drink. It should therefore be stated/communicated more clearly that Nutri-Score must only be used to compare products within the same product range.

In addition, the fact that the Nutri-Score is calculated for products as they are sold and not as they are consumed (meaning after preparation) should be clearly communicated. This way, unprepared oven fries, for example, can obtain a favorable Nutri-Score, despite the fact that they will contain a lot of fat when consumed. The consumer should be made aware of this nuance.

If you have any further questions or remarks, please do not hesitate to contact me.

Kind regards

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