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Position Paper

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EDA Position on Nutri-Score

Nutri-Score needs adaptation for cheese in order to be more useful to consumers and better aligned with dietary guidelines

- EDA is fully engaged on nutrition and health topics with policy-makers, industry groups and other stakeholders to help make a positive impact on the overall public health.
- We support the consumer right to be fully informed on nutritional properties of foods which is one of the legal requirements of the Food Information to Consumer Regulation (EU) No 1169/2011. Voluntary labelling schemes, used in addition to the mandatory nutrition declaration, can be a useful tool for consumers who are looking for additional nutritional information on food labels, if it helps consumers make healthier choices and follow dietary guidelines.
- Currently, the most commonly used front of pack nutrition scheme in the EU is Nutri-Score (adopted in France, Belgium, Spain or in the process of being adopted by Germany and the Netherlands).
- **From the dairy perspective, while the Nutri-Score scheme seems suitable for fresh dairy products like yoghurts, it is unfortunately not adequate – in its current form – to reflect the nutritional richness of cheese.**

Should Nutri-Score be considered EU-wide, EDA calls for the following principles to be respected:

1. **One harmonised system for all EU**
2. **The system should be voluntary** meaning that it is the food business operator's decision whether they wish to use the logo on their products
3. **The system's underlying criteria should be science-based and the resulting scores need to be in line with the dietary guidelines of the MS**
4. **The system should be effective regarding the nutritional quality of the consumers' food basket.** Allowing consumers to identify best nutritional options within sub-categories of dairy products (show an improvement in the consumer's behaviour). Therefore, it should be (sub-)category-specific. It should give the opportunity to help the consumer in making little steps towards better choices.
5. **The system should be under continuous independent scientific guidance and evaluation.** The scheme should be evaluated (ex-ante and ex-post after an evaluation period of x years) in order to check the consumer



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understanding and behaviour improvement regarding the place of the food in a balanced diet. The recent announcement of the creation of an international scientific committee is a very welcomed development supported by EDA.

6. **A consistent and comprehensive education programme to increase understanding of healthy diets among consumers and how to interpret the scoring system.** Consumers need a general education regarding the information given on the label. This will give better understanding of how to interpret the Nutri-Score system in order for them to choose a healthy diet based on the front of pack label and in line with national dietary recommendations.
7. **All stakeholders should be involved** in decision making as only an endorsement of all relevant stakeholders will encourage the use of voluntary front-of-pack scheme on packaging.
8. **The current algorithm should be adapted for the cheese category as currently, almost all cheeses are in orange D category:**
 - The current Nutri-Score does not allow any differentiation within the cheese category, whatever the fat (from 13 to 40%) or the salt content (from 0,1 to 2,5%), the score remains the same (D). The current ranking of the cheese category is also independent from its calcium content.
 - This is not only against Nutri-Score aim (as it does not allow consumers to choose the “best” products within the category) but it is also inconsistent with the dietary recommendations in the EU Member States (which all include dairy/cheese as part of a healthy and balanced diet).
 - From a consumer perspective the current Nutri-Score for cheese may have a negative impact as it could prevent people from eating cheese, potentially leading to calcium deficiencies and further public health consequences. Dairy foods, including cheese, are the leading contributors to calcium intake in the EU populations.

Nutri-Score needs modification for cheese

The aim of a simplified nutrition labelling scheme such as Nutri-Score is to help consumers making healthier food choices using an information about the nutritional quality of foods. Nutri-Score has two goals:

- Enabling consumers to evaluate the contribution of a food product to a healthy balanced diet with regards to its nutritional composition.
- Giving more visibility in the changes in nutritional compositions from one product to another considering the nutrients of particular interest.

Unfortunately, for cheese category, none of these goals is currently met for the following reasons:

- **Nutri Score does not help consumers to choose the “best” products within the category, as almost all cheeses are currently in D category**
- **For cheeses, Nutri-Score is inconsistent with the dietary recommendations.** Cheeses, thanks to their natural nutrient richness (calcium, high quality milk proteins and many other nutrients), are included in the



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national dietary recommendations across the EU, either as part of the wider dairy food category or specifically as cheeses in some countries.

- **One of the major arguments from the health authorities supportive of Nutri Score is that it prompts food manufacturers to reformulate their products in order to improve the score - for cheeses it is not possible** as whatever the fat (from 13 to 40%) or the salt content (from 0,1 to 2,5%), the score remains the same. The current ranking of the cheese category is also independent from its the calcium content. To illustrate it with a concrete example, cheeses within the following nutrient ranges are all scoring D: 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.
- **Although there is a specific provision for cheese in the Nutri-Score¹, in practice it is insufficient as the link between calcium and proteins is only taken into consideration for products with a 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 content.²
- We would also like to point out that **the EU Nutrition and Health Claims Regulation 1924/2006 recognises the nutritional importance of high protein content of the 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. As the EU nutrition and health claims are scientifically evaluated, we believe that this approach could also be reflected in the Nutri-Score.
- The dairy sectors needs an adaptation that would improve the scoring of most cheeses with higher nutritional richness, in order to enable a **better differentiation of cheeses among Nutri-Score classes** (currently limited to D or E categories) and to align it **with national dietary recommendations.**
- **EDA is willing to work actively on this important subject, in order to evaluate possibilities of improvements of the current Nutri-Score algorithm in cooperation with scientists and authorities, in order for the scheme to be not only more useful to the consumers to make an informed choice, but to also reflect better the current dietary guidelines in the EU.**

¹ 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.”

² Calculations of more than 10000 cheeses based on OpenFoodFacts