FPS Health, Food Chain Safety and Environment
to the attention of Mr Berthot and Mme Doughan
Avenue Galilée, 5 box 2
1210 Brussels

Leuven, May 4th 2021

Subject: Evaluation of the rules for the cheese and dairy drinks categories in the Nutriscore algorithm by the international scientific committee

Mr Berthot, Ms Doughan,

The CBL has already informed you of its concerns regarding the Nutriscore algorithm for the cheese and dairy drinks categories (cf. CBL/FPS meeting of 19/11/2019 and 9/3/2021). With this letter, we formally request you, as Belgian members of the Steering Committee, to ask the European scientific committee to study and analyse our concerns, and consider improvements to the current system.

1. The algorithm for cheeses

Because of their nutritional quality, dairy products (including cheeses) are included as a food group of which the intake should be promoted in the recommendations of the Belgian dietary guidelines of the Superior Health Council[1]. Despite this clear recommendation, we note that the majority of all cheeses are classified by the system in the less favourable scores (see annex 1). Moreover, despite great differences in nutritional composition between cheeses, the majority of them is classified with score D (see annex 2).

The nutritional quality of cheeses is, however, acknowledged by the Nutri-Score system. Indeed, the current system provides a modification to calculate the score for cheeses. As such, the system aims to better take into account the relative calcium content of cheeses, by always counting the protein content, regardless of the total N value[2].

Despite this adjustment made for cheeses, and contrary to what it wanted to take into account, the score attributed to each cheese appears to be almost independent of their protein (6-33 g/100g)[3] and therefore calcium (90-1000 mg/100g)[3] content. The fat content (15-40 g/100g)[3] also has a negligible influence on the score that is finally obtained.

The current algorithm and the resulting scores therefore do not reflect the nutritional quality of cheeses on one hand and diversity of cheeses on the other hand, which does not allow the consumer to distinguish between them. One of the reasons for this poor differentiation is the way positive points are awarded to protein for cheeses, which is considered an indicator of the calcium content of cheeses. Indeed, the maximum number of positive points (5 points) is obtained for 8g of protein per 100g of product. However, the majority of cheeses (90%)[3] have a content of more than 8g. The current calculation therefore fails to correctly reflect the existing correlation between the protein and calcium contents of cheeses, and consequently does not allow them to be discriminated according to their calcium content.

2. The implementation of the algorithm for dairy drinks

The Nutri-score algorithm for beverages differs from the calculation for solid foods. The thresholds for according negative points for energy and sugar are lower for beverages[4]. In order to better take into account their nutritional value (especially proteins and calcium), the Nutri-score for drinkable milk products is calculated with the algorithm for solid products instead of beverages. A content of 80% milk is put forward in the Nutri-score FAQ as a threshold for drinkable milk products to use the algorithm for solid products. Furthermore, according to the Nutri-score FAQ the Nutri-score for plant-based drinks should also be calculated with the algorithm for solid products. However, it is unclear on which base it was decided that the plant-based drinks would also benefit from the exclusion of the beverage category, and moreover not to subject this group of products to a similar threshold (as provided for the milk products), especially since plant-based drinks do not naturally contain calcium and most of them do not meet the protein content nor quality of milk. From this point of view, a threshold on at least calcium and protein content seems appropriate.

Furthermore, the current FAQ only mentions 'milk' as raw material in the threshold, whilst most drinkable dairy products do not only contain milk as such, but other milk components as well (e.g. retentate, permeate, buttermilk, whey...). From a nutritional perspective it would be coherent that these components that have an equally favourable nutritional quality as milk were included in the composition of the threshold. Given the absence of scientific substantiation for the threshold of 80%, it seems appropriate that this threshold be subject to scientific analysis, in which the necessity of its existence, its composition, and its harmonisation over different food categories are thoroughly examined.

We therefore call on the Steering Committee to transfer these issues to the Scientific Committee for scientific assessment, with the aim of 1) achieving a better translation in the score of the nutritional characteristics of the cheeses on the one hand and their differences on the other hand to better assist consumers in their choice among cheeses, in accordance with dietary recommendations and 2) clarifying, refining and scientifically substantiate the criteria for products (e.g. dairy drinks and plant based drinks) to use the algorithm for solid foods.

We thank you for your consideration of this matter and remain at your disposal for any questions or clarifications. We look forward to your response.

Yours sincerely,

E. Goyens

Food Policy Advisor

R. Debergh

Managing Director
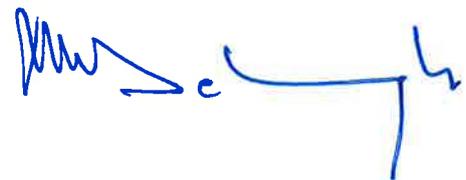
References

[1]Superior Health Council (2019). *Dietary Guidelines for the Belgian adult population – 2019*, SHC No. 9284

[2]*Nutri-score Frequently Asked Questions*, version updated 03/03/2021

[3]EDA (2020). Position Paper on Nutriscore of January 22nd 2020. *Nutriscore needs adaptation for cheese in order to be more useful to consumers and better aligned with dietary guidelines*

[4]Koninklijk besluit van 1 maart 2019 betreffende het gebruik van het logo "Nutri-Score", *Belgisch Staatsblad*, 1 april 2019

Annex

1. Distribution of cheeses based on Nutri-score

Distribution cheeses based on Nutri-score (Delhaize)
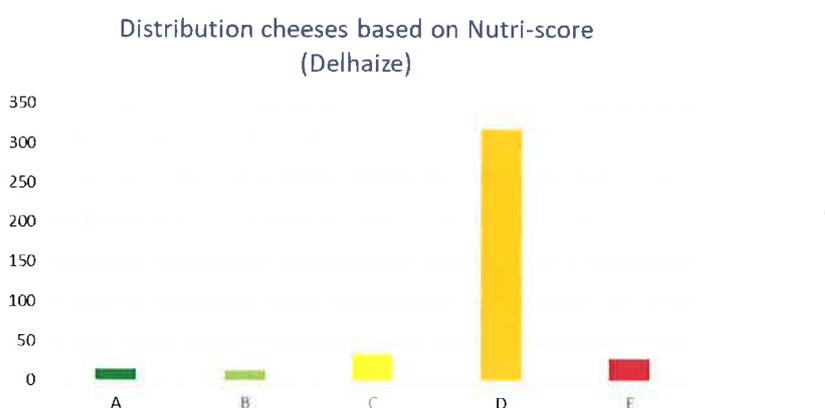
The graph above shows the distribution of cheeses available on the Belgian market according to their Nutri-score, based on data from website https://www.delhaize.be/ consulted on 2/4/2021. The distribution shows that the vast majority of cheeses (78,52%) is categorised in D.

2. Examples of nutritional range of cheeses in category D

Per 100g	Gouda young	La Vache qui rit	Brugge old	Mozzarella di buffala campana
Energy (kcal)	369	239	397	288
Saturated fatty acids (g)	21	12,5	19,7	17
Proteins (g)	24	11,5	26	15
Salt (g)	2,1	1,8	2,1	0,7

The table above shows the variation in nutritional value of cheeses available on the Belgian market that are ranked D, based on data from website https://www.delhaize.be/ consulted on 2/4/2021.