

For the attention of the members of the COEN Steering Committee

Brussels, 7 July 2021

Subject: Support to the MVO proposal for the adjustment of the Nutri-Score algorithm applicable to the category margarines and spreads

Dear Madam/Sir,

IMACE is supportive of initiatives that aim to provide consumers with easy-to-understand and non-misleading information related to the nutritional characteristics of foods, and beyond the mandatory nutrition declaration pursuant to Regulation (EU) No 1169/2011. IMACE, nonetheless, is of the opinion that such information should be in accordance with transparent and objective criteria based on robust and sound scientific evidence. IMACE endorses the intentions at the basis front-of-pack labelling systems such as the Nutri-Score, i.e., to educate consumers about nutrition and empower better informed choices for healthy diets. However, the current Nutri-Score algorithm is not fully in line with the scientific evidence and the national recommendations in many EU Member States regarding the health and nutritional benefits and dietary recommendations for the margarine and spread category.

IMACE would therefore like to bring to your attention a proposal developed by the Netherlands Oils & Fats Industry (MVO) to update the Nutri-Score algorithm, in order to reflect the real health and nutritional benefits of the different products within the margarine and fats category in the context of your work towards a harmonised Nutri-Score calculation system across Europe.

The overall nutritional recommendations in Europe (WHO guidelines, EFSA opinions, ...) is to replace the saturated fatty acids in the diet by unsaturated fatty acids (mainly poly-unsaturated fatty acids). Furthermore, a sufficient intake of the essential fatty acids are recommended.

The outcome of the Nutriscore algorithm should reflect the nutritional recommendations on fats to guide the consumer towards the most healthy fat option.

In that context, the MVO proposal suggests the following amendments:

1. To expand the criterion of 'fruit & vegetables' in the general algorithm to include oils and fats that are entitled to make the EU nutrition claim 'high in omega-3';
2. To expand the criteria for the group 'added fats' with a new criterion 'unsaturated fat/total fat', in accordance with the EU nutrition claim 'high in unsaturated fat';
3. To introduce an adjustment to the saturated fats (SAFA) criterion for the group 'added fats' in accordance with the EU nutrition claim 'high in unsaturated fat'.

IMACE trusts that the proposed suggestions will contribute to a harmonised Nutri-Score labelling across Europe that will truly inform and guide consumers to make sustainable and healthy food choices within the margarine and spread offer. The recommendations are further explained in the Annex in attachment to this letter.

IMACE hopes that you will take the proposed adjustments into consideration in your work regarding the optimization of the Nutri-Score calculations.

We remain at your disposal, should you have any questions.

Sincerely Yours,



Siska Pottie

Secretary General IMACE

Annex: 1 MVO proposal for the adjustment of the Nutri-score algorithm.

ANNEX: MVO proposal for the adjustment of the Nutri-Score

The current Nutri-Score doesn't fulfil its main goal to inform and guide consumers to make healthier food choices, as the calculation method fails to account for the full nutritional value of foods. This is the case of margarine and spreads, which, under the current methodology, can only achieve a score C, at best. For this reason, IMACE endorses the recommendations developed by the Netherlands Oils & Fats Industry (MVO) to adjust the algorithm to better reflect the nutritional benefits and the varieties of margarines and spreads, aligning it with nutritional recommendations for the group "added fats". The application of these adjustments would lead different added fats to score between B and E, facilitating consumers' understanding and identification of healthier and less healthy options within this food category, while reflecting the wide range of options currently available on the market.

Proposed adjustments

- 1 To expand the criterion of "fruit & vegetables" in the general algorithm to include oils and fats that are entitled to make the EU nutrition claim "high in omega-3".**

Some vegetable oils (e.g. walnuts, rapeseed, olive oils) are already included within the positive criterion alongside fruit, vegetables and pulses, due to their high content in mono- and poly-unsaturated fatty acids. We propose to expand the positive criterion also to margarine and spreadable fats bearing the authorised EU claim "high in omega-3". This adjustment will give **additional 5 positive points to omega-3 rich fats**, which will provide a fair analysis of the nutritional content of a product and improve its ranking (e.g. from D to C, from C to B).

Rationale: According to EFSA¹ evaluation, a daily consumption of 2g of alpha-linolenic acid (ALA) helps maintain a healthy cholesterol level in the blood. This health claim is relevant to foods that fulfil at least the nutrition claim, "source of omega-3" and is thus applicable to the nutrition claim "high in omega-3". Margarine and spreads bearing this claim represent an important source of omega-3 and should therefore be recognised as such within the Nutri-Score calculation method.

¹ [Scientific Opinion on health claims](#), EFSA

2 To expand the criteria for the group “added fats” with a new criterion “unsaturated fat/total fat”, in accordance with the EU nutrition claim “high in unsaturated fat”.

The Nutri-Score currently takes into account only the saturated fat content of fat-based products, disregarding unsaturated fats and the essential role they play in human health, which makes margarine and spreadable fats extremely valuable. Expanding the criteria for the group “added fats” with a new criterion “unsaturated fat/total fat” will ensure more differentiation within the added fats category and help consumers make healthier choices.

The criterion unsaturated fats/total fats would be divided as follows:

Unsaturated fat / total fat	Points
content ≤ 70	0
70 < content ≤ 75	1
75 < content ≤ 80	2
80 < content ≤ 85	3
85 < content ≤ 90	4
90 > content	5

Rationale: In accordance with the evaluation by EFSA, the following health benefits of unsaturated fatty acids have been approved:

- The replacement of saturated fats with unsaturated fats in nutrition contributes to the preservation of normal cholesterol levels in the blood. This health claim (Article 13) is established in EU Regulation 432/2012.²
- The replacement of saturated fats with unsaturated fats in nutrition contributes to the preservation of normal cholesterol levels in the blood. Oleic acid is an unsaturated fat. This health claim (Article 13) is established in EU Regulation 432/2012.³

² [Scientific Opinion on health claims](#), EFSA

³ [Scientific Opinion on the substantiation of health claims related to oleic acid intended to replace saturated fatty acids](#), EFSA

- It has been shown that the replacement of saturated fats with unsaturated fats in the diet reduces blood cholesterol. A high cholesterol level is a risk factor for the development of coronary heart disease. This disease risk reduction claim is established in EU Regulation 1226/2014.⁴

These health claims can only be used for foods with a high unsaturated fatty acid content, as described in the nutrition claim ‘high in unsaturated fats’, established in EU Regulation 1924/200624 as follows: ‘70% of the fatty acids present must be derived from unsaturated fatty acids and unsaturated fatty acids must supply at least 20% of the product's energy’. For a correct calculation, trans fatty acids (unsaturated fatty acids in the trans configuration, TFA) **cannot be** included in the amount of unsaturated fatty acids. According to EFSA recommendations⁵, dietary intake of TFA should be as low as possible. Since years industrial TFA in oils, spreads and cooking fats have been mitigated but as only industrial TFA are recently regulated by EU Regulation 2019/649, dairy products that are part of the “added fats” category, can still contain ruminant TFA in substantial amounts. Hence TFA should not contribute to the positive effect of unsaturated fatty acids in the calculation. On the contrary TFA levels above 2%TFA on total fat (limit set by Regulation 2019/649 for industrial TFA) should be penalized given their harmful health effect.

3 To introduce an adjustment to the saturated fats (SAFA) criterion for the group “added fats” in accordance with the EU nutrition claim “high in unsaturated fat”.

Many fats and oils whose consumption is recommended in national nutritional guidelines (e.g. low-fat margarine is part of nutritional dietary guidelines in Belgium, the Netherlands, Scandinavian countries) would rank low on the Nutri-Score. IMACE endorses MVO’s suggestion to **correct the negative criterion for the “saturated fat/total fat” ratio** so that fats which contain up to 30% saturated fats will not be impacted by the criterion.

Saturated fat / total fat	N Points
<10	0
<16	0

⁴ [Scientific Opinion on the substantiation of a health claim related to “low fat and low trans spreadable fat rich in unsaturated and omega-3 fatty acids”](#), EFSA

⁵ [“Scientific and technical assistance on trans fatty acids”](#), EFSA, November 2018.

<22	0
<28	0
<30	0
<34	4
<40	5
<46	6
<52	7
<58	8
<64	9
>=64	10

Rationale: Fat spreads substantially contribute to the intake of unsaturated fatty acids, essential fatty acids and fat soluble vitamins (e.g. vitamins A, D, E and K), which help, among others, to protect essential fatty acids from oxidative damage, maintain normal bones, teeth, muscles, skin, vision, and support the well-functioning of the immune system. Fat spreads may also contain plant sterols that reduce blood cholesterol⁶. Elevated levels of blood cholesterol are a risk factor for cardiovascular disease. Consumers may receive confusing messages and the Nutri-Score may lose credibility, if on one hand a product is recommended by nutritional guidelines and on the other hand scores a “C” in the algorithm.

It should also be taken into account that the daily consumption of margarine and spreads is only around 20g/day, whilst the Nutri-Score calculations are based on 100g of a particular food. The proportion of the total saturated fatty acid dietary intake through consumption of margarine and spreads is limited.

Through adjustment to the SAFA criterion for the group “added fats” in accordance with the EU nutrition claim “high in unsaturated fat” all healthy fats can score higher (e.g. olive oil can score a “B” instead of a “C”). The outcome of these adjustments does justice to the fact that some of the “added fats” should be considered as healthier and therefore should be preferred by consumers.

⁶ [Commission Regulation \(EC\) No 983/2009](#)

