

9 March 2021

**UNESDA request for consideration to the
International Scientific Committee on Nutri-Score:
*Adaptation of the Nutri-Score system for beverages***

Dear Members of the International Scientific Committee on Nutri-Score,

On behalf of UNESDA, the European soft drinks association, I wish to thank the International Scientific Committee on Nutri-Score in advance for considering our request.

This request is for the Committee's kind consideration to our proposal for making some - relatively limited - adaptations to the Nutri-Score scheme for beverages. These adaptations are proposed to help consumers make the most informed choices and avoid confusion, to align the scheme more closely with the EU Nutrition and Health Claims Regulation and to stimulate the beverage industry towards further sugar reduction and product innovations with less sugar.

We arrived at conclusions for proposing such adaptations based on an in-depth scientific and technical review which we conducted in partnership with the French public health consultancy, LinkUp. Included in the report of this evaluation are three alternative suggestions for specific adaptations of the scheme to optimize it for consumers and to stimulate further reformulation from industry. We respectfully leave it to the expertise of the Scientific Committee to select the most appropriate route.

Important note: Our concerns are essentially focused on adaptations to allow a limited number of soft drinks to move from Nutri-Score rating D to C, and from Nutri-Score rating C to B in order to reflect more accurately the sugar content of these drinks and to allow consumers to make informed choices about which drinks contains less sugar.

Please see below a summary of our request and of our specific proposals for moving forward.

We very much look forward to the outcome of your discussions. In the meantime, please do not hesitate to contact me should you require any additional information.

With kindest regards,



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1. Scientific and technical review: Success factors for front-of-pack nutrition labelling

In partnership with the French public health consultancy, LinkUp, UNESDA has conducted a scientific and technical review of the key success factors for front-of-pack nutrition labelling to meet the dual public health objectives which are:

- to optimize consumer information about overall nutritional content; and
- to encourage food and beverage producers to improve nutritional content.

The principal focus of this review is on the Nutri-Score front-of-pack labelling scheme.

2. Why are we proposing adaptations to the current system of Nutri-Score for beverages?

Our review shows that the current Nutri-Score system for beverages is not fully optimized to support the above-mentioned two key objectives for a front-of-pack nutrition labelling scheme.

The analysis of the impact of the current Nutri-Score scheme on a large representation of beverages for sale in Belgium, France and Spain showed:

a) Information for consumers is not optimised, hampering their ability to easily choose the product containing less sugar

- Uneven distribution between and within rankings:

There is an imbalance in the distribution of products within the same category, in this case soft drinks, across the Nutri-Score scale (i.e., A-E rankings, with A being the highest ranking). This is particularly striking for France, where more than 80% of soft drinks are ranked D or E, despite an extremely wide variation in sugar content.

Furthermore, there is also potential for confusion created within a specific ranking. For example, beverages with very different sugar levels have the same D score (between 3.5g to 7g sugars per 100 ml).

Some real-life soft drink examples:

Products with the same Nutri-Score rating but with significantly different sugar levels

May Tea (blackberry/blueberry)
Labelled 'low in calories'



FAIBLE EN CALORIES	
NUTRITION / VOEDING	
Energie/Energie	39 kcal
Matières grasses/Vetten	0 g
dont acides gras saturés/ waarvan verzadigde vetzuren	0 g
Glucides/Koolhydraten	4.4 g
dont sucres/waarmen suikers	4.3 g
Protéines/Eiwitten	0 g
Sel/Zout	0.00 g

Score 6

Dr Pepper



DECLARATION NUTRITIONNELLE VOEDINGSWAARDEVERKLARING NUTRITION DECLARATION	
ENERGIE / ENERGY	118 kcal
MATIÈRES GRASSES (DONT ACIDES GRAS SATURÉS) VETTEN (WAARVAN VERZADIGDE VETZUREN) FAT (OF WHICH SATURATES)	0 g
GLUCIDES (DONT SUCRES) KOOHYDRATEN (WAARVAN SUIKERS) CARBOHYDRATES (OF WHICH SUGARS)	6.9 g
PROTÉINES / EIWITTEN / PROTEINS	0 g
SEL/ZOUT / SALT	0.02 g

Score 9

Current Nutri-Score (both products):



UNESDA approaches 1, 2 or 3



Same Nutri-Score rating despite significantly different sugar content - 4.3g/100ml v 6.8g/100ml (+58%).

Without considering the 'low calorie' claim or the nutrition table, the consumer may mistakenly consider that the two products with a Nutri-Score D rating have the same nutritional quality.

Each of the three proposed UNESDA approaches makes it possible to distinguish between the two products thanks to different NutriScore ratings.

-Conflicting information on the label:

Misalignment with the EU Nutrition and Health Claims Regulation 1925/2006, particularly with its Annex, results in contradictory on-pack messages for the consumer and potential confusion. **For example, products with a “low energy” nutrition claim are assigned a ‘D’ ranking** according to the current Nutri-Score algorithm. This is also relevant for other claims such as “low in calories,” “no calories,” “no sugar,” “sugar free” or “reduced sugar.” This gives consumers conflicting messages on the label of the same product.

Some real-life soft drink examples:

‘D’ Nutri-Score Rating = contradictory message to the ‘low -calorie’ claim

Fuze Tea Peach Hibiscus
Labelled ‘low in calories’



100ml :
79kJ / 19kcal
4.3g sugar

Current Nutri-Score



UNESDA approaches 1, 2 or 3



May Tea (blackberry/blueberry)
Labelled ‘low in calories’



100ml :
78kJ / 18kcal
4.3g sugar

b) The current Nutri-Score scheme does not incentivise soft drink producers to reformulate and pursue improved rankings of B or C, even with reformulations as high as 50%.

Once a soft drink exceeds 0 grams of sugar, it is immediately given a C ranking, even for a sugar content as low as 0.1 grams per 100ml. This is not the same approach as applied to foods and does not provide consumers with the appropriate information to choose a soft drink with less sugar.

Some real-life soft drink examples:

Products with the same Nutri -Score rating but with different sugar levels

Fanta Orange
‘No calories’



100ml :
11kJ / 3kcal
0.4g sugar

Current Nutri-Score



UNESDA approaches 1, 2 or 3



Beverages eligible for ‘no calories’ claims given the same C-rated Nutri-Score as beverages with up to 7 times the sugar content (0.1-3.5g/100 ml) which does not allow consumers to distinguish between the lower sugar options

3. UNESDA proposal and request to the International Scientific Committee

To optimize the Nutri-Score algorithm for beverages, UNESDA respectfully requests for consideration of the International Scientific Committee, three alternative approaches, as outlined in scenarios 1, 2 and 3 as set out in the table below.

Scenarios 2 and 3 would each lead to relatively limited adjustments of the five colour nutritional scale cut-offs and would not modify the core principles of Nutri-score, whereas scenario 1 would represent a more fundamental change compared to the current system.

Each of these slightly different approaches would:

- **Optimize consumer information and help people make more informed choices** by improving the distribution of products *between* and *within* the various Nutri-Score rankings and also, reduce the potential for consumer confusion by aligning the Nutri-Score scheme for beverages more closely with the EU Nutrition and Health Claims Regulation
- **Provide a greater incentive for soft drinks producers to reformulate and to innovate and pursue improved rankings.**

NUTRI-SCORE® RATING	INITIAL NUTRI-SCORE®	SCENARIO 1	SCENARIO 2	SCENARIO 3
A	Waters only	Waters Less than 0.05% sugars Waters (natural mineral water, spring water, table water and drinking water), including those for which the only added ingredients are carbon dioxide and/or flavourings (acc. to Annex V number 3, EU Food Information Regulation 1169/2011)	Waters Less than 0.05% sugars Waters (natural mineral water, spring water, table water and drinking water), including those for which the only added ingredients are carbon dioxide and/or flavourings (acc. to Annex V number 3, EU Food Information Regulation 1169/2011)	Waters Less than 0.05% sugars Waters (natural mineral water, spring water, table water and drinking water), including those for which the only added ingredients are carbon dioxide and/or flavourings (acc. to Annex V number 3, EU Food Information Regulation 1169/2011)
B	Min to 1 point (FSA score)	0.05-2.5% sugars Beverages qualifying for the following nutrition claims as per the EU Claims Regulation 1924/2006: "sugars free" (max 0.5g sugars/100ml) "energy free" (max 4 kcal (17 kJ)/100ml) "low in sugars" (max 2.5g sugars/100ml)	Min to 2 points (FSA score) Current Nutri-Score system + 1 pt Content of sugars: 0-1.5%	Min to 3 points (FSA score) Current Nutri-Score system + 2 pts Content of sugars: 0-1.76%
C	2 to 5 points (FSA score)	> 2.5 – 5% sugars Beverages qualifying for "low in calories" as per the EU Claims Regulation 1924/2006 - max 20 kcal (80 kJ)/100ml	3 to 6 points (FSA score) Current Nutri-Score system + 1 pt Content of sugars: 1.55-4.5%	4 to 7 points (FSA score) Current Nutri-Score system + 2 pts Content of sugars: 1.77-5.29%
D	6 to 9 points (FSA score)	> 5 – 7% sugars Beverages that may qualify for "reduced sugars" as per the EU Claims Regulation 1924/2006	7 to 10 points (FSA score) Current Nutri-Score system + 1 pt Content of sugars: 4.55-7.5%	8 to 10 points (FSA score) Current Nutri-Score system + 1 pt Content of sugars: 5.30-7.5%
E	10 to max points (FSA score)	> 7% sugars Other beverages	11 to max points (FSA score) Current Nutri-Score system + 1 pt Content of sugars: ≥7.55%	11 to max points (FSA score) Current Nutri-Score system + 1 pt Content of sugars: ≥7.55%