

Draft

Report on the application of Directive 90/496/EEC on nutrition labelling for foodstuffs

1. Background

Nutrition labelling of food is currently regulated by Directive 90/496/EEC, under which *nutrition labelling is optional*; it becomes *compulsory when a nutrition claim is made* in the labelling, presentation or advertising of a foodstuff.

The Directive also lays down a *standardised format* in which nutrition labelling must be presented; two types of declaration are provided for:

- Group 1 (basic information to be given when nutrition labelling is provided consisting of *energy, protein, carbohydrate and fat*);
- Group 2 (extended information required if a declaration is made for certain nutrients consisting of *energy, protein, carbohydrate, fat, saturates, sugars, sodium/salt and fibre*).

Information may also include the amounts of a number of other nutrients such as starch, polyols, mono- and poly-unsaturates, cholesterol and vitamins and minerals listed in the Annex of the Directive. Technical details as to, among others, the energy conversion factors for certain nutrients, the units to be used for the declaration of the nutrients are also provided in the Directive.

The White Paper on Food Safety announced the intention of the Commission to put forward a proposal amending Council Directive 90/496/EEC on nutrition labelling for foods in order to bring the provisions on nutrition labelling into line with consumer needs and expectations (Action n°66). The White Paper indeed identifies nutrition labelling as an important tool in helping consumers make informed dietary choices, adapted to their individual needs. Provisions of that Directive are also an important and necessary support for other related Community legislation and regulatory proposals currently under discussion regarding claims and the addition of vitamins and minerals and of certain other substances to foods.

The Directive also requires that the Commission shall submit to the European Parliament and the Council a report on the application of Directive 90/496/EEC and accompany that report with any appropriate proposals for amendments.

In view of preparing this report, as well as appropriate proposals for the amendment of the Directive, the European Commission launched a consultation in January 2003 among Member States and stakeholders.

The responsible Commission Services (Health and Consumer Protection Directorate-General (DG SANCO)) sought the views of national authorities and stakeholders regarding:

- issues arising from implementation of the current Directive;

- considerations and comments for its future revision;
- information on the possible impact (positive and negative) associated with future regulatory change.

The letter addressed to Member States and stakeholders for that purpose is attached (Appendix).

2. Report on current legislation

In the January 2003 consultation, DG SANCO requested the views, considerations and comments of Member States and stakeholders regarding how the current legislation has worked in practice. More specifically, the Commission asked to receive information on points such as:

- the extent to which nutrition labelling is made available to consumers on foodstuffs sold in a Member State or in the EU today (e.g. proportion of the market, type of foods providing nutrition labelling etc...), recognising that nutrition labelling is only required at present where a nutrition claim is made;
- the views of consumers regarding the usefulness, acceptability and understanding of the current nutrition labelling format (determined where available from consumer research conducted in Member States);
- any specific considerations and implementation issues encountered by the food industry (e.g. nutrient declaration, format, timing...) and retailers;
- comments and considerations of Member States concerning enforcement of the current legislation;
- and finally, the perspective of nutrition and health professionals regarding the usefulness of the current nutrition labelling format as an information tool to support information and educational campaigns regarding healthy diets and lifestyles.

2.1. Presence of nutrition labelling in the EU

The presence of nutrition labelling on foodstuffs appears to be fairly widespread in the Community. Although current EU legislation makes nutrition labelling mandatory only when a nutrition claim is made, most Member States report a large spectrum of foods that carry nutrition labelling, even in the absence of a nutrition claim.

From comments received by Member States, it would appear that nutrition labelling is more widely prevalent in the North than in the South of Europe. While there does not appear to be specific market studies on this question, some Member States did provide estimates concerning the proportion of foodstuffs on the market carrying nutrition labelling today. For instance, UK authorities estimate that 80% of pre-packaged foodstuffs provide nutrition labelling while government authorities in Greece state that 30% of foods provide nutrition information.

The food industry also states that nutrition labelling can be an important information tool, however, it is not applied today uniformly across the EU. There are notable differences in the use of nutrition labelling by food category. The principal foods

which include nutrition information in labelling are; fruit juices, breakfast cereals, yogurts and fermented milks, margarines, ready-to-eat meals (frozen or ambient), and pre-packed fruit and vegetables. In certain markets products such as beverages, sodas and biscuits also carry nutrition labelling.

Foodstuffs which usually do not display nutrition information in labelling include; bakery products, cakes, chocolate and cocoa powder, sweets and soft drinks. Fresh meat, bacon and ham usually do not provide nutrition information, although such information can be made available to consumers upon request by means other than labelling itself.

Where nutrition labelling is present, and in the absence of a specific claim regarding sugars, saturates, fibre and/or sodium (nutrients included in Group 2), the nutrient declaration is usually limited to the Group 1 nutrients (i.e. energy, protein, carbohydrate and fat) as specified by Directive 90/496/EEC. However, this also varies by market and according to consumer interest in specific nutrition information. Again, it appears that a more complete and comprehensive nutrient declaration (i.e. Group 2) tends to be more prevalent in countries in the North of Europe such as the United Kingdom and Ireland.

The food industry and retailers also stress that lack of space on the label, notably for small, irregularly shaped and/or multi-lingual packs cannot accommodate the extensive nutrient declaration required by Directive 90/496/EEC. This may be a deterrent from providing nutrition labelling. In this context, economic operators also argue for flexibility to allow shorter nutrient declarations. For instance, when a claim is made concerning one of sugars, saturates, fibre and/or sodium, manufacturers and retailers request the right to be able to provide information about Group 1 nutrients along with the specific nutrient for which the claim is made, rather than be obliged to label the full eight nutrients required by the Group 2 declaration.

2.2. Consumer understanding and use of nutrition labelling

Nutrition labelling is considered by Member State authorities and stakeholders alike as an information tool and not a source of nutrition education in and of itself. All respondents therefore stress the need to support consumer understanding and facilitate use of information conveyed by nutrition labelling through appropriate educational programmes as well as complementary information schemes off the label (e.g. care lines, consumer education materials, point of sale information...).

While consumer research on nutrition labelling is principally available in Northern European countries (United Kingdom, Denmark, Finland, Sweden, Norway, Iceland and recently France), all countries confirm that consumers welcome the provision of nutrition information in food labelling. Based on available research, it is possible that there is a higher level of interest in nutrition information among consumers in Northern Europe. In all markets however, it would appear that consumer knowledge about nutrition labelling and their ability to use effectively the nutrition information that is provided is relatively low, particularly among occasional or “potential” users of nutrition labelling. It appears that nutrition labelling is principally used today by consumers to check the nutritional content of new foods and to compare the nutritional composition of foods.

Respondents to the Commission's consultation also highlight the need for a "user friendly" label, focused on key, essential nutrients. The saliency of specific nutrients is not necessarily the same in all markets, and depends also on the particular emphasis of national public health programmes. The current label appears to be difficult for consumers to use and should be simplified if and where possible in order to facilitate understanding and use. For instance, consumers request the use of simple, understandable terms, i.e. salt instead of sodium, "matières grasses" instead of "lipides", "calories" instead of "energy." Many argue that, if possible, the declaration of energy as kJ (in addition to kcal) should be abolished as this is not understood by consumers.

The challenge for possible revision of the design of the nutrition label will be to meet apparently competing or dichotomous consumer needs. Based on available research, there appears to be an "information paradox" whereby consumers request a label which is both concise yet comprehensive. A short label is not necessarily well received as it is perceived to possibly omit key information.

Finally, all respondents confirm the need for further education in order to motivate more consumers to read nutrition labels and facilitate their use in guiding dietary choices.

2.3. Implementation issues

Member States and stakeholders have not identified major issues in the implementation of Directive 90/496/EEC. However, in addition to the need to simplify nutrition labelling for the benefit of consumers, all underline the need to address specific gaps in the current legislation regarding a range of technical issues. Respondents stress the need to ensure that the revision of EU Nutrition Labelling rules take into account and is consistent with related legislative proposals such as: the revision of Labelling Directive 2000/13, Food Supplements Directive 2002/46, PARNUTS legislation (eg Directive 2001/15/EC regarding substances that may be added for specific nutritional purposes in foods for particular nutritional uses), as well as legislative proposals regarding nutrition and health claims and the addition of nutrients to foods.

The technical issues which need to be addressed in the future revision of Directive 90/496/EEC include points such as:

- **Absence of legal definitions for all nutrients**

Article 1.4 sets a series of definitions for nutrients and substances included in nutrition labelling. Under the current Directive, the definition and method of analysis for dietary fibre shall be determined by the Standing Committee procedure. This point was also raised in the context of recent discussions regarding the proposed Regulation on nutrition and health claims.

Respondents underline the need to define and agree a method of analysis for dietary fibre as a priority item. This may also have implications for the definition of carbohydrates. Some respondents state that a definition for certain vitamins may be

required, notably for vitamin A, as well as the ability to declare separately beta-carotene content. Other suggestions include the introduction of definitions for: organic acids, salt (specifying the conversion factor to be utilised from sodium), trans fatty acids, and specific polyunsaturated fatty acids such as EPA (eicosapentaenoic acid), DHA (docosahexaenoic acid) etc

- **Energy conversion factors**

Article 5 of the current Directive identifies energy conversion factors for a range of nutrients/food components (carbohydrates, polyols, protein, fat, alcohol and organic acids) and indicates that any amendments will be undertaken by the Standing Committee procedure.

All respondents support the review and update of the list of energy conversion factors. The priority items identified include: dietary fibre, non digestible carbohydrates (eg inulin), sugar alcohols, and new fats such as salatrims. Energy conversion factors need to be defined and addressed in relation to discussions regarding the definition of nutritional substances (e.g. dietary fibre).

In addition, many state that for the determination of protein content for dairy products the conversion factor of 6.38 times the total nitrogen content should be adopted instead of current factor of 6.25 that applies to all proteins.

- **Tolerances for nutrient declaration**

The current Directive stipulates that the definition of tolerable margins between values declared on labelling and those obtained by official controls should be determined following the Standing Committee procedure. The task of setting tolerable margins for the declaration of nutrient content for food supplements was also identified as a priority during the discussions that led to the adoption of the Directive 2002/46/EC on food supplements.

Most respondents agree that tolerances should be defined at Community level (either via legislation or guidelines) in order to avoid trade barriers and ensure consumer protection. Certain Member States suggest that stricter tolerances may need to be set for substances with safety concerns.

Some Member States already have guidelines in place for the declaration of vitamin and mineral content (Denmark, Finland) as well as for macro-nutrients (UK). Member States also state that it may be necessary to discuss sampling and analytical methods and whether these need to be specified in legislation.

Industry argue that different tolerances should be set for different foodstuffs (e.g. dietary supplements) taking into account factors such as: raw material variation, food matrix, processing and storage. Tolerances should also take into account whether vitamins/minerals are naturally occurring or added through food fortification. Tolerances may need to be defined for specific nutrients in order to reflect issues of stability (e.g. vitamin C).

Industry and some Member States also underline that the existence of tolerances should not lead to the requirement for individual laboratory testing to derive

nutritional values for labelling purposes. Current legislation allows the use of food composition tables to derive such values and this should continue to be the case. This is a particularly important point for small and medium enterprises which may not have the internal resources and analytical facilities to determine nutritive values for their products.

- **Annex: list of vitamins and minerals**

The Annex of Directive 90/496/EEC identifies a list of vitamin and minerals that may be included in nutrition labelling along with their recommended daily allowances. It also indicates what constitutes a “significant amount” for the purpose of nutrient declaration (e.g. 15% RDA per 100g/ml or per package if the package only contains a single portion). The Annex predates the lists of vitamins and minerals included in the recently adopted Directives 2001/15/EC on substances that may be added for specific nutritional purposes in foods for particular nutritional uses and 2002/46/EC on food supplements.

All respondents agree that the current list of vitamins and minerals in Directive 90/496/EEC needs to be modified and updated taking into account the lists of nutritional substances which figure in Directive 2002/46/EC on food supplements and in Directive 2001/15/EC on substances that may be added for specific nutritional purposes in foods for particular nutritional uses. This list should also take into account future legislative proposals with regards to nutrition and health claims and the addition of vitamins and minerals and of certain other substances to foods.

The list of Recommended Daily Allowances should also be updated taking into account the recent opinion of the Scientific Committee for Food on the revision of reference values for nutrition labelling (expressed on 5 March 2003). In addition certain Member States and stakeholder groups recommend that Nutrient Reference Value for labelling purposes also be defined for specific target populations, notably children aged 3-10 years old.

Most respondents also highlight issues encountered regarding the level of nutritional significance required for the declaration of vitamins and minerals, i.e. 15% RDA per 100g or 100ml, or per package if the package only contains a single portion. This level is thought to be too high for liquids and for products with high moisture content (e.g. milk, fruits/vegetables, fruit juice, non dehydrated soups, yogurts and fermented milks). Such products cannot today label nutrient content for which their contribution is usually recognised.

A discrepancy also exists between the nutrient declaration for single serve packs and larger unit sizes. For instance, under current legislation, a beverage packed in a single serve unit (e.g. 330 ml) may contain 15% RDA of a given nutrient per unit and hence provide a nutrient declaration, while such a declaration may not be possible if the same beverage is presented in a one litre bottle (i.e. if the nutrient level per 100 ml does not meet the 15% RDA level).

There is also a strong consensus among Member States and stakeholders in favour of rounding values (for both macro- and micro-nutrients) and that such rounding rules be defined at Community level.

Finally, certain Member States and stakeholders suggest that consideration be given to the specification of conversion factors for beta-carotene (and other carotenoids) to retinol equivalents. Some argue that it should also be possible to label beta-carotene as such based on its vitamin A content.

Conclusion

Overall, Member States and stakeholders welcome the revision of the Nutrition Labelling Directive and endorse its objective to facilitate understanding and use by consumers of nutrition labelling in the selection of healthy diets.

The Commission will put forward the necessary proposals following consultations with the interested stakeholders and the Member States.

APPENDIX TO THE REPORT ON THE IMPLEMENTATION OF DIR. 90/496/EEC



EUROPEAN COMMISSION

HEALTH & CONSUMER PROTECTION DIRECTORATE-GENERAL

Directorate D - Food Safety: production and distribution chain

Director

Brussels, 21 January 2003

ALG/acda/D440686 (2002)

Subject: Request for information in view of the revision of Council Directive 90/496/EEC on Nutrition Labelling

Dear Sir/Madam,

In view of submitting to the European Parliament and Council a report on the application of Directive 90/496/EEC on nutrition labelling for foodstuffs since its introduction in June 1990, as well as appropriate proposals for its amendment, the European Commission is consulting Member States and stakeholders.

We would appreciate receiving the views of national authorities regarding:

- 1) issues arising from implementation of the current Directive;
- 2) considerations and comments for its future revision;
- 3) information on the possible impact (positive and negative) associated with future regulatory change.

Background

The White Paper on Food Safety announced the intention of the Commission to put forward a proposal amending Council Directive 90/496/EEC on nutrition labelling for foods in order to bring the provisions on nutrition labelling into line with consumer needs and expectations (Action n°66). The White Paper indeed identifies nutrition labelling as an important tool in helping consumers make informed dietary choices, adapted to their individual needs. Provisions of that Directive are also an important and necessary support for other related Community legislation and regulatory proposals currently under discussion regarding claims and the addition of nutrients to foods.

I. Report on current legislation

The European Commission would like to receive the views, considerations and comments of Member States and stakeholders regarding how the current legislation has worked in practice. It would be particularly relevant for the Commission to be informed of points such as: the extent to which nutrition labelling is made available to consumers on foodstuffs sold in a Member State or in the EU today (e.g. proportion of the market, type of foods providing nutrition labelling etc...), recognising that nutrition labelling is only required at present where a nutrition claim is made; the views of consumers regarding the usefulness, acceptability and understanding of the current nutrition labelling format (determined where available from consumer

research conducted in Member States); any specific considerations and implementation issues encountered by the food industry (eg nutrient declaration, format, timing...) and retailers; comments and considerations of Member States relative to enforcement of the current legislation; and finally, the perspective of nutrition and health professionals regarding the usefulness of the current nutrition labelling format as an information tool to support information and educational campaigns regarding healthy diets and lifestyles.

II. Future amendments

Following this review of existing legislation and practices, the European Commission will proceed to prepare a proposal for amending the current Nutrition Labelling Directive. The overall objective will be to improve the existing nutrition labelling rules in order to further facilitate consumer understanding and informed choice, and aid consumers in selecting healthy diets, appropriate for their individual needs.

To date, the Commission has identified ten topical areas to be taken into account in the future revision of the Directive which are indicated hereunder. According to the provisions concerned, amendments would be introduced either through a Directive of the European Parliament and of the Council (points n°1 –5) or through a Commission Directive (points n°6-9, and n°10 if limited to the definition of dietary fibre).

1. Nature of the declaration: voluntary vs mandatory

Under the current legislation, nutrition labelling is optional unless a claim is made, in which case it becomes compulsory. Given growing consumer interest in food, nutrition and its relation to health, as well as the need to provide consumers with both pertinent and accurate information about the foods they consume, it is timely to reconsider whether nutrition labelling should not be provided on all foodstuffs, and even in the absence of a nutrition claim. The Commission recognises that the introduction of mandatory nutrition labelling would no doubt require certain exceptions and is seeking the comments of Member States and stakeholders both on the point of principle (voluntary vs mandatory declaration) as well as the potential considerations to be taken into account, should mandatory labelling be proposed.

2. Nutritional information to be provided: what key nutritional information do consumers require?

When nutrition labelling is provided, the current legislation provides for two types of mandatory nutrient declaration, including both a simple and more complete declaration (ie Group 1/Group 2), and allows for information to be given optionally for a number of other nutrients. The Commission will reconsider, in the context of a proposed revision of the Directive, the nutrient declaration itself in order to ensure that consistent information is provided which is both meaningful to consumers and feasible for the food industry.

Comments are therefore being sought as to the number and nature of nutrients to be included in nutrition labelling, and whether the current 2-tier declaration (ie simple/expanded) should be maintained. For instance, information is being requested regarding the declaration of the amount and/or type of fat, eg whether trans fatty acid content should be included and in which manner, whether the declaration of polyunsaturated fatty acids may be replaced with a declaration of n-3 and n-6 polyunsaturated fatty acids etc...If new nutrients are suggested for inclusion in nutrition labelling, the European Commission would also appreciate receiving proposed definitions for these nutrients.

3. Presentation of nutrition information: what format should be utilised?

The Commission has received in the past information from some Member States and stakeholders indicating that the current presentation of nutrition information specified in Directive 90/496/EEC is difficult for consumers to understand and utilise effectively. The Commission is therefore seeking comments on the presentation of nutrition information regarding points such as:

- format to be utilised (eg linear, tabular, graphical presentation...)
- order of nutrients and/or highlighting of certain nutrients
- best language to express nutritional terms (eg salt vs sodium, vitamin B1 instead of thiamine...)
- possible use of symbols to designate nutrients
- accuracy, ie use of rounding for declaration of nutritional values
- legibility, font size etc...
- expression of nutritional content in units and/or as % of a value to be determined (eg RDA, Guideline Daily Amounts, Daily Reference Values, Labelling Reference Values ...)

4. Nutrition labelling: link with recommendations regarding healthy diets and lifestyles

Nutrition labelling can be an important tool to help consumers make food choices consistent with their dietary goals. In order to be effective, nutrition labelling must be integrated into an overall educational programme. Indeed education is key in order to help consumers better understand and utilise the information on food labels to meet their specific needs.

The European Commission is therefore seeking comments regarding new and innovative means of presenting nutrition information contained in the label which could facilitate consumers' understanding of the contribution of a particular foodstuff or certain of its constituents to nutrition and health, taking into account generally accepted scientific advice. This could include the potential negative impact of certain food ingredients or constituents.

With regards to the above, the Commission would like to receive information regarding new means of communicating nutritional information which could include: expression of the nutritional content as a percentage of daily recommended intakes (for macro- and micro-nutrients), use of symbols and other graphic presentation, illustrations, suggested wording etc... The Commission is particularly interested in those communications schemes that may have already been tested and validated among consumers.

In addition, the Commission would appreciate receiving information concerning educational programmes on healthy diets and lifestyles conducted by nutrition and health authorities, health promotion organisations, consumer associations, industry groups and other stakeholders, and particularly those initiatives developed to help consumers better understand and utilise the nutrition label.

5. What is the most appropriate reference quantity for nutritional declaration?

Current legislation requires the declaration of nutrient content per 100g/100 ml. In addition, information may be given per serving as quantified on the label, or portion,

provided that the number of portions contained in the package is clearly stated. Comments have been received from some interested parties stating that nutrient declaration on a per serving basis is more meaningful to consumers. Others argue however that declaration per 100g/100 ml allows easier comparison of nutritional content between different products or product categories, in particular as servings may not represent similar quantities for all foods across the Community. The Commission is therefore seeking advice as to the reference quantity judged to be most appropriate for nutritional labelling.

6. Are more specific measures required for non-prepackaged foodstuffs?

Article 8 of the current Directive states that in the case of non-prepackaged foodstuffs (sold to the ultimate consumer or to mass caterers), the extent of nutritional information provided and the manner of its communication may be determined by national provisions until the eventual adoption of specific Community measures. The Commission is therefore seeking information as to whether any such national measures have been implemented since the coming into force of Directive 90/496/EEC and whether the declaration of nutritional information for non-prepackaged foodstuffs should be addressed in more detail in the revision of this Directive.

7. Energy conversion factors: are modifications required?

Article 5 of the current Directive identifies energy conversion factors for a range of nutrients/food components and indicates that amendments to these factors and/or addition to the list of substances/food components will be undertaken by the Standing Committee procedure. The Commission is therefore seeking comments regarding this list in order to take into account new scientific and technological developments.

8. Declaration of vitamin and mineral content: how should the Annex be revised?

The Commission is aware that the current list of vitamin and minerals which may be declared in nutrition labelling (cf Annex of Directive 90/496/EEC) is not up-to-date and should be modified taking into account, among others, the lists of vitamins and minerals included in the recently adopted Directives 2001/15/EC on substances that may be added for specific nutritional purposes in foods for particular nutritional uses and 2002/46/EC on food supplements. The values referred to as Recommended Daily Allowances may also need to be modified in light of scientific developments and may also need to be renamed. Finally, comment is sought regarding the definition of what constitutes a “significant amount”, and whether the current value of 15% RDA per 100g/100 ml remains appropriate.

9. Tolerances for declaration of nutritional values

The current Directive stipulates that the definition of tolerable margins between values declared in labelling and those obtained by official controls should be determined following the Standing Committee procedure. The Commission is therefore seeking comments and considerations for the development of acceptable tolerances for macro- and micro-nutrient declarations. The Directive on nutrition labelling does not apply to food supplements, the latter being subject to specific nutrition labelling rules. However, the task of setting tolerable margins for the declaration of nutrient content for food supplements was also identified as a priority during the discussions that led to the adoption of the Directive 2002/46/EC on food

supplements. Therefore the comments submitted should take into account that margins of tolerance should be developed for the declaration of nutrients both for foodstuffs in general and for food supplements. The Commission would be particularly interested on the rationale, technical or other, to justify any specific suggestions, depending on the nutrient concerned, and also taking into account, where applicable, the nature of certain foodstuffs.

10. Definitions: are these still appropriate today?

Under the current Directive, the definition and method of analysis for dietary fibre need to be determined according to the Standing Committee procedure. The need to define dietary fibre was raised by certain Member States and stakeholders during preliminary discussion on the regulatory proposal on nutrition and health claims. The European Commission will take into account any relevant discussion on the definition of dietary fibre as well as on any other definition listed in Article 1 of Directive 90/496/EEC in preparing proposals for the revision of this Directive. Any comments and/or considerations on these points would be welcome.

III. Impact Assessment

The Commission would also appreciate hearing your views as to the possible impact (positive and negative) which could be associated with future revision of the Nutrition Labelling Directive (ie possible future amendments outlined in section II). Examples of economic, social, and public health impacts could include:

- Economic:
 - industry: changes in compliance costs; administrative and financial burden in particular for SMEs; structural changes in investment; impacts on the potential for innovation and technological development; market shares and trade patterns; constraints associated with multi-lingual packaging; effects on food distribution channels...
 - authorities: administrative burden and implementation costs for national authorities (eg control and enforcement)...
 - consumers: possible impact on consumer prices
- Social:
 - consumers/public health: changes in consumer awareness, understanding and attitudes to food, nutrition and health; changes in food consumption patterns; effects on particular sections of the population...
- Public health: role/contribution of nutrition labelling to public health nutrition strategies, including nutrition education; role of nutrition labelling as an information tool to facilitate selection of healthy diets; possible future impact on health care costs (for diet-related diseases or conditions)...

Any other information and/or considerations that you think would be useful to consider for the development of a proposal to revise the current Nutrition Labelling Directive would also be appreciated. The Commission Services would be grateful to receive information by **7 March 2003**. Please send your response to

Ms Anne-Laure Gassin, Food Law & Biotechnology Unit, Health & Consumer Protection Directorate-General, European Commission, B-1049 Brussels or email Anne-Laure.Gassin@cec.eu.int.

Thank you very much in advance for your contribution regarding the revision of the Nutrition Labelling Directive and for collaborating with the Commission in continuing to establish EU legislation which will facilitate informed consumer choice.

(Signed)

Paola TESTORI COGGI