

Consultation Information

Title: Food information to consumers -

Consultation on Front-of-Pack Nutrition Labelling, Nutrient Profiles, Origin Labelling and Date Marking

Start date of consultation: 11th February 2021

Closing date: 25th March 2021

Consultation details:

Background

[‘The European Green Deal’](#) sets out how to make Europe the first climate-neutral continent by 2050. The [‘Farm to Fork Strategy- for a fair and environmentally friendly food system’](#) is part of the European Green Deal, recognising the inextricable links between healthy people, healthy societies and a healthy planet. In terms of food labelling, the provision of clear information that makes it easier for consumers to choose healthy and sustainable diets will benefit their health and quality of life and reduce health-related costs.

To empower consumers to make informed, healthy and sustainable food choices, the European Commission will develop proposals for harmonised mandatory front-of-pack nutrition labelling and setting nutrient profiles. The Commission will also consider proposing the extension of mandatory origin or provenance indications to certain products (taking into consideration the impact on the Single Market) and a revision of the EU rules on date marking (‘use by’ and ‘best before’). The Commission has published two inception impact assessments regarding the Farm to Fork initiatives; one on [origin labelling, front-of-pack nutrition labelling, and date marking](#) and another on [setting nutrient profiles](#).

This consultation seeks to gather the views of stakeholders on the following four aspects of labelling.

Front of Pack (FoP) nutrition labelling

Regulation (EU) 1169/2011 on food information to consumers (FIC) requires a nutrition declaration on the label of most prepacked foods, which is almost always displayed on the back of a package. There are detailed requirements for the information that must be declared, and in what order.

FIC also permits a voluntary repetition of certain information from the mandatory nutrient declaration on the 'principal field of vision' of the label i.e. the front-of-pack (FoP). The following may be repeated - the energy value alone or the energy value together with the amounts of fat, saturates, sugars and salt.

Additional forms of expression and/or presentation of the nutrition declaration (e.g. graphical forms or symbols) can be used by food business operators or recommended by Member States, provided that they comply with the criteria set out in FIC. There are a number of schemes already being used by some Member States and these include Reference intakes labelling (developed by industry), Nutri-score, Keyhole and the UK Multiple-traffic lights scheme, presented in the table below.

Accompanying the Farm to Fork Strategy, the European Commission adopted a [report](#) on front-of-pack nutrition labelling. In its initial impact assessment, the Commission will consider the following types of harmonised FoP nutrition labelling schemes:

1. Nutrient-specific labels – numerical (e.g. Reference Intakes);
2. Nutrient-specific labels – colour-coded (e.g. Multiple Traffic Light labelling) ;
3. Summary labels – endorsement logos (e.g. Keyhole);
4. Summary labels – graded indicators (e.g. Nutriscore).

For options 1 to 4, nutrient profiles are set. For option 1, the setting of a nutrient profile model separate from the non-interpretative front-of-pack nutrition label will be assessed. Options 2 to 4 concern evaluative (interpretative) front-of-pack labels, evaluating the nutrition information for the consumer. Colour-coded nutrient specific labels and summary labels are based on nutrient profiling criteria.

Nutrient Profiles

Nutrient profiling is the science of classifying or ranking foods depending on their nutrient composition. FoP nutrition labels which calculate the score of a food, either by colour or symbol, are based on nutrient profiles e.g. the Keyhole symbol, Nutriscore etc. Nutrient profiles are intended to help consumers make healthier food choices.

Nutrient profiles are calculated by using maximum values for restricted nutrients such as sugar and saturated fat and sometimes use minimum values for promoted nutrients such as fibre. Based on these calculations, the food is given an overall score or permitted to display a symbol. The nutrient profiling criteria can be applicable to all food categories or be specific to different food categories. As such, an explanation of the nutrient profiling criteria does not appear on labels. As well as informing FoP nutrition labelling, nutrient profiles have a variety of applications, including regulation of food marketing to children.

In the EU, it is intended to use the concept of nutrient profiles to determine if a food can make a nutrition or health claim. The intention is to prevent a positive health message (either by way of a nutrition or health claim) on foods high in restricted nutrients such as saturated fat, sugar and salt.

Origin labelling

In general, under FIC rules, origin labelling on food labels is required where its absence might mislead consumers. So certain colour schemes or emblems and graphics used on food labels could mislead the consumer into thinking a prepacked food product has originated in a certain country. However, mandatory rules on the origin of certain food products have been adopted, including [Commission Regulation 1825/2000](#) on the labelling of beef and beef products, [Commission Implementing Regulation 1337/2013](#) for pork, lamb, poultry, goat and [Commission Implementing Regulation 2018/775](#) on the primary ingredient of a food.

Under the Farm to Fork Strategy, the Commission will consider drafting a proposal to extend origin indication for certain food categories. The Commission inception impact assessment states that the following foods were identified as those in which consumers have particular interest to know where they are coming from:

- milk and milk used as an ingredient,
- meat used as an ingredient,
- rabbit and game meat,
- rice,
- durum wheat used in pasta,
- potatoes and
- tomato used in certain tomato products.

The Commission impact assessment will review mandatory origin indication provided at different geographical levels.

Date Marking

The objective of the Farm to Fork Strategy action on date marking is to prevent consumers from unnecessarily discarding foods past their 'best before' date by tackling the misunderstanding and misuse of date marking (the 'use by' and 'best before' dates).

FIC requires that the shelf-life of a foodstuff be indicated by either a date of minimum durability ('best before') or a 'use by' date. Typically, a 'best before' date is used for food products such as canned, dried, ambient, frozen foods etc. Many foods that are past their 'best before' date may be safe to eat, but their quality may have deteriorated.

In the case of foods, which from a microbiological point of view, are highly perishable and are therefore likely after a short period to constitute an immediate danger to human health, the date of minimum durability must be replaced by the 'use by' date. The 'use by' is the date up until which a food may be used safely i.e. consumed, cooked or processed, once it has been stored correctly.

A shelf-life declaration i.e. a 'best before' or 'use by' date, is not required for several foods¹, including:

- Fresh fruit and vegetables,
- Wines
- Beverages containing 10 % or more by volume of alcohol
- Solid sugar
- Non-pre-packaged foods

¹ included in Annex X(1)(d) of the FIC Regulation

Table: Front of pack labelling schemes, Storcksdieck genannt Bonsmann et al. (2020) [Front-of-pack nutrition labelling schemes: a comprehensive review](#), Joint Research Council Science for Policy Report.

FOP labelling scheme	Country	Examples of visuals	Key features
Reference Intakes label, previously referred to as Guideline Daily Amounts (GDA)	EU-wide		<ul style="list-style-type: none"> Nutrition information (energy plus four nutrients: fat, saturated fat, sugars, and salt) in grams and as percentage of daily reference intake. Portion as main reference base; 100 g or 100 ml as reference base for additional energy info. Typically monochrome.
UK Multiple Traffic Lights (MTL) (hybrid scheme)	UK		<ul style="list-style-type: none"> Nutrition information (energy plus four nutrients fat, saturated fat, sugars, and salt) in grams and as percentage of daily reference intake. Traffic light colour coding indicating low (green), medium (amber, and high (red) levels of the nutrients stated. Portion as reference base for numerical information; 100 g or 100 ml as reference base for colour coding⁷ and additional energy info. Separate colour thresholds for solid foods and beverages.
Keyhole	Sweden, Norway, Denmark, Iceland, Lithuania, North Macedonia		<ul style="list-style-type: none"> Endorsement scheme ('positive logo') based on threshold levels for energy and various nutrients depending on product category. Foods labelled with the Keyhole contain less sugars and salt, more fibre and wholegrain and healthier or less fat than food products of the same type not carrying the symbol. Some food categories are not permitted to carry the logo (e.g. sweet and savoury snacks). Reference base typically is 100 g or 100 ml.
Nutri-Score (previously called 5-Colour Nutrition Label (5-CNL))	France, Belgium (Spain, Germany, the Netherlands Luxembourg)		<ul style="list-style-type: none"> Graphic scale that divides the nutritional score into 5 classes (expressed by a colour and a letter), based on the food's content of energy, sugars, saturated fat, sodium, 'fruit, vegetables, and nuts', fibre, and protein. Algorithm based on UK Food Standards Agency (FSA) Nutrient Profiling system; minor modifications to FSA score algorithm for cheese, added fats, and beverages to improve consistency between Nutri-Score classification and French nutritional recommendations.⁵ Reference base for the nutritional score calculation is 100 g or 100 ml.

Submissions to the consultation

Submissions may be made through our [online questionnaire](#).

Feedback:

A report on the responses will be prepared by the FSAI and it will be shared with the Department of Health.

Personal Data

Any personal data, within the meaning of the Data Protection Acts 1988-2018, submitted as part of the consultation process, will be treated in line with the requirements of these Acts.

Personal identifying information contained in submissions will not be published in accordance with the Data Protection Acts 1988 and 2003 and the Freedom of Information Act 2014.