

**AIM reaction to the European Commission Roadmap on the initiative:  
'Food labelling - revision of rules on information provided to consumers'**

***Introduction***

AIM sees potential in the Roadmap of the EC on the Revision of Information provided to Consumers. We welcome the initiative as we are convinced of the importance of properly informing consumers in order to empower them to make the right choice for their health and the environment. If the correct scenarios are chosen, the proposed measures could also encourage companies to produce healthier products in a more environmental-friendly way and thus allow both to reduce the impact of food systems on the environment and to improve public health, by contributing to tackle non-communicable diseases through better eating habits. Implementing the base-line scenarios would on the other hand constitute a missed opportunity and an obstacle to reaching the high ambitions set by the European Commission in its Farm to Fork Strategy and its EU Green Deal.

The following paragraphs highlight the scenarios AIM recommends the European Commission to follow and the reasons supporting those recommendations.

***Recommendation 1: Develop EU nutrient profiles, based on the WHO model***

These are the arguments which support the recommendation:

***A. Consumers need coherent nutrition messages.***

An EU profile would allow producing coherent public health nutrition messages based on scientific evidence. The Council<sup>1</sup> also recognises the potential of profiles in avoiding “that nutrition and health claims mask the overall nutritional status of a food product and thus mislead consumers when they are trying to make healthy choices in the context of a balanced diet”. A coherent labelling system would also make it easier for those less literate in nutritional science to make informed dietary choices. (see recommendation 2A)

***B. Misleading health claims should be forbidden.***

Nutrient profiles should indeed be used as a basis to restrict the use of nutrition or health claims regarding foods high in fat, sugar or salt (HFSS foods). Studies<sup>2</sup> show that some claims are totally uncorrelated to actual nutrition quality and yet influence consumers' opinion regarding taste, healthiness and diet.

A prominent example of this is the sandwich chain “Subway”, which is marketed as a healthy alternative fast food chain. Yet, in 2020 the Irish Supreme Court ruled that Subway buns contained so much sugar, they could not legally be considered as “bread”.

***C. Children should be protected from the marketing of unhealthy products.***

Nutrient profiles should be used to prohibit the marketing of foods high in fat, salt or sugar to children. Marketing influences children's preferences, their purchase requests, and consumption patterns. It has also been associated with an increased risk of obesity and being overweight in

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<sup>1</sup> <https://data.consilium.europa.eu/doc/document/ST-13694-2020-INIT/en/pdf>

<sup>2</sup> <https://journals.sagepub.com/doi/full/10.1177/0743915618824332>

children.<sup>3</sup> Prohibiting the marketing of HFSS foods on the basis of set profiles represents an opportunity to create food environments that promote healthy nutrition. Moreover, according to a 2020 EU Barometer<sup>4</sup>, “nearly eight in ten [EU citizens] (79%) consider that marketing and advertising that do not contribute to healthy, sustainable diets should be restricted”, which shows that such a restriction would likely be supported by the population.

**D. *The profiles are necessary to set a basis of harmonised EU Front-of-Pack Nutrition Labelling.***

See the next recommendation.

***Recommendation 2: Develop summary labels with graded indicators***

These are the arguments which support the recommendation:

**A. *Clear labels allow consumers to better and more easily monitor their diet.***

Research<sup>5</sup> shows that consumers find food labels confusing, preventing them from properly monitoring their diet. Summary labels with graded indicators (Nutris-core-type) help consumers “(...) assess the healthiness of products more easily”.<sup>6</sup> They can also contribute to steering them to healthier purchasing decisions.<sup>7</sup>

Some food labels are especially confusing as they use different measurements as the rest of the packaging. For example: many chewing gums give dietary information measured by grams per 100g, however, the packaging itself only measures “strips”, leaving the consumer without any information as to how much of which nutrients they are actually consuming.

Other foods may switch between grams and millilitres etc., which also makes it impossible for consumers to determine the total nutritional value of the product.

**B. *Summary labels with graded indicators would encourage the reformulation of HFSS foods.***

By influencing consumer choices, labels with graded indicators would also encourage the industry to create products with better grades. The Dutch RIVM<sup>8</sup> found out that there are great variations in salt, saturated fat and sugar content within food groups, sometimes even within the same type of food (e.g. tomato soup), showing that there is room for improvement for lowering the levels of salt, fat and sugar in food recipes. AIM believes the introduction of such labels would encourage the food industry to reformulate some of their least healthy products to propose healthier alternatives.<sup>9</sup>

Yet, there is also a risk to be taken into account when developing or implementing that type of labelling:

- Already existing and implemented schemes are at times misleading. Frozen French fries ranking A when they are actually meant to be fried and olive oil (that can for example be used to dress a salad) getting the same ranking as a pack of processed crisps or salted peanuts are some examples of how graded indicators can sometimes be confusing.

To avoid that confusion, AIM believes the schemes should take into account the way a product is cooked and the quantities which are usually consumed. In addition, the implementation of

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<sup>3</sup> <https://www.who.int/features/2014/uk-food-drink-marketing/en/>

<sup>4</sup> [file:///C:/Users/jessica/AppData/Local/Temp/eps\\_505\\_en.pdf](file:///C:/Users/jessica/AppData/Local/Temp/eps_505_en.pdf)

<sup>5</sup> <https://www.sciencedirect.com/science/article/abs/pii/S0950329319300849?via%3Dihub>

<sup>6</sup> <https://www.foodnavigator.com/Article/2020/10/29/How-does-Nutri-Score-impact-shoppers-purchase-intentions>

<sup>7</sup> [https://www.sciencedirect.com/science/article/abs/pii/S0195666320316172?dgcid=rss\\_sd\\_all](https://www.sciencedirect.com/science/article/abs/pii/S0195666320316172?dgcid=rss_sd_all)

<sup>8</sup> <https://www.rivm.nl/en/food-reformulation>

<sup>9</sup> As it is actually the case with the « Nutri-Score. See: <https://www.dossierfamilial.com/actualites/vie-pratique/le-nutri-score-incite-les-industriels-a-revoir-leurs-recettes-432115>

any new scheme should be accompanied by campaigns to educate the general public on how to interpret the information on labels and the way different foods impact their health.

***Recommendation 3: EU-level mandatory origin indication should be provided on the labels of most products, together with information regarding a product's ecological footprint***

These are the arguments which support the recommendation:

***A. Consumers have the right to know where their food comes from.***

As highlighted by BEUC<sup>10</sup>, “consumers’ demand for origin information on food is strong and deserves full consideration.” Most consumers want to know the origin of meat, fish, milk and dairy products, fruit and vegetables and over 50% of consumers the origin of single-ingredient foodstuffs (e.g. sugar, salt, flour) and of coffee/tea. This demand cannot be ignored. Voluntary origin indication often remains a marketing argument but has not yet been implemented by the industry to a satisfying degree.

***B. The EU Green Deal and the Farm to Fork objectives can only be met if consumers are aware of the impact of their food on the environment.***

Only 22% of Europeans cite the “low environmental and climate impact” of food when considering whether food is sustainable and 24% consider “local or short supply chains” as an important characteristic.<sup>11</sup> Only by making consumers aware of that impact through educational campaigns and allowing them to act accordingly can the objectives of the Farm to Fork Strategy and the European Green Deal be met.

***C. The Food Industry would be incentivised to lower their ecological footprint.***

Following the same rationale as the one mentioned above for summary labels, mentioning the ecological footprint of a product would encourage the consumption of foods with a lower impact on the environment and incentivise industries to lower their ecological footprint. It would contribute to reducing the impact of food systems on the environment.<sup>12</sup>

***Recommendation 4: Improve the expression and presentation of date marking.***

These are the arguments which support the recommendation:

***A. The current marking is confusing.***

According to a European Commission Briefing<sup>13</sup>, only a third of consumers are able to correctly interpret the meaning of the 'best before' date. More clarity is needed to allow consumers to differentiate between food safety and quality concepts. AIM encourages the European Commission to investigate the best way in terms of wording and format/layout.

***B. A clearer marking would contribute to reduce food waste.***

A study carried out by the European Commission found that the annual EU-28 food waste attributable to date marking issues was estimated to respectively amount to 5%, 55% and 9.5-12% of the total waste across the manufacturing/processing, retail and household sectors. According to that same

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<sup>10</sup> <https://www.beuc.eu/publications/2013-00043-01-e.pdf>

<sup>11</sup> [file:///C:/Users/jessica/AppData/Local/Temp/ebs\\_505\\_en.pdf](file:///C:/Users/jessica/AppData/Local/Temp/ebs_505_en.pdf)

<sup>12</sup> AIM believes that Industry should also be made accountable for food packaging. Substances harmful to health should be banned from food contact materials. In that sense, AIM looks forward to the revision of the EU rules on food contact materials.

<sup>13</sup> [https://www.europarl.europa.eu/RegData/etudes/BRIE/2015/548990/EPRS\\_BRI\(2015\)548990\\_REV1\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2015/548990/EPRS_BRI(2015)548990_REV1_EN.pdf)

study, “(...) the greatest opportunities for prevention of food waste in relation to date marking exist for milk and yoghurts, fresh juices, chilled meat and fish”.<sup>14</sup>

*C. Improving marking would allow households to save money.*

Throwing away less is also buying less. A Dutch study<sup>15</sup> from 2015 showed that 39% of the products were thrown away if the best before date had expired. Respondents also threw away 31% less if the term ‘Long shelf life’ was used on the packaging. AIM believes that clearer options could be used to inform consumers on the safe date to consume foods. Those changes could have a positive impact on both food waste and household budgets.

**Overall concern**

AIM is aware that the wide implementation of the above-mentioned changes could represent a considerable and sometimes unbearable cost for some SMEs. AIM yet believes that action should be taken and that national governments and the European Commission should financially support smaller producers. Since it might be difficult for smaller companies such as butchers or farmers who sell in farm shops or at markets to provide concrete information on nutritional values, another option could also be that companies up to a certain size should be excluded from the obligation to implement some of the above-made proposals. This would above all relieve (organic) farmers who sell regionally but would make large companies liable.

On the other hand, AIM believes that SMEs selling locally might even profit from environmental labelling, as the close proximity between production and selling points would be likely to have a smaller ecological footprint than products which have to travel longer ways.

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<sup>14</sup> [https://ec.europa.eu/food/sites/food/files/safety/docs/fw\\_lib\\_srp\\_date-marking.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/fw_lib_srp_date-marking.pdf)

<sup>15</sup> [https://ec.europa.eu/food/sites/food/files/safety/docs/fw\\_lib\\_dm\\_nld\\_wageningen-ur\\_terminology-effect.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/fw_lib_dm_nld_wageningen-ur_terminology-effect.pdf)