

The background of the page is a solid green color with a repeating pattern of small, light green icons representing various food items such as fruits, vegetables, meats, and dairy products. A vertical dotted line is positioned on the left side of the page, starting from the top and ending at the bottom where it meets a white circular graphic element.

# IFOAM Organics Europe's position paper on nutrition labelling & the Nutri-Score

August 2022

## Table of Contents

1	Political & health context and citizens' trends .....	2
1.1	Political context.....	2
1.2	Health context.....	2
1.3	Citizens' tendencies .....	2
2	What should a nutrition label look like? .....	2
2.1	The bigger picture and organic farming.....	3
2.2	The Nutri-Score: a well-intentioned approach, with shortcomings .....	3
2.3	The NOVA classification: looking at the processing level of foods.....	4
3	Conclusions .....	5

## Executive summary

IFOAM Organics Europe supports the initiative of the Commission to tackle the issue of non-communicable diseases and believes that a front-of-pack (FOP) nutritional label must be part of a wider systemic change in the food environment, aligned with the ambitions of the Farm to Fork Strategy.

If a FOP nutritional label shall be implemented at EU level, we would like to address some concerns and recommendations regarding the characteristics it should have (section 2). Specifically, we would like to address the issue of ultra-processed foods and of the naturalness of food products that are currently not taken into account in currently proposed FOP labels (section 2.2) and propose that the level of processing of foods is adequately considered, through the NOVA classification (section 2.3).

# 1 Political & health context and citizens' trends

## 1.1 Political context

The Farm to Fork Strategy, part of the Commission's European Green Deal, is meant to lead a global transition towards fair, healthy and environmentally friendly food systems. One area that the Farm to Fork Strategy aims to address is ensuring food security, nutrition and public health. In this context, the Commission plans to propose a harmonised mandatory front-of-pack (FOP) nutrition label by the end of 2022, with the aim of empowering consumers "to make informed, healthy and sustainable food choices"<sup>1</sup>.

## 1.2 Health context

The Farm to Fork strategy rightly mentions that European diets are not in line with national and international dietary recommendations and that the healthy option is not always the easiest one. The Global Burden of Disease (GBD), one of the most comprehensive studies to measure the impact of morbidity and mortality on populations, estimates that in the European Union in 2017, over 950,000 deaths and over 16 million DALYs (Disability-Adjusted Life Years) were attributable to dietary risks due to unhealthy diets<sup>2</sup>. In addition to the human costs, these diseases are also burdening the countries in terms of healthcare costs, a sector that is particularly critical in the context of the covid-19 pandemic.

For these reasons, IFOAM Organics Europe welcomes the willingness of the Commission to address diet-related diseases such as those associated with overweight and obesity as well as other non-communicable diseases (NCDs).

While actions are required to address NCDs, these cannot be limited to a FOP label that consists in a repetition or an interpretation of the ingredients list already available on the package. Indeed, there is a need to ensure that food environments holistically support healthy and nutritious diets. While an FOP nutrition label may provide some useful information, it is important to highlight that more is needed to promote healthy and nutritious diets. For instance, education and raising awareness of the characteristics of healthy and sustainable diets from a young age, as well as making sure that healthy and nutritious products are also the most available and affordable ones.

## 1.3 Citizens' tendencies

According to a 2021 Eurobarometer survey, the key tendencies of EU citizens when purchasing food are to be satisfied when it comes to taste, food safety and cost. The nutrient content of the food is fifth and concerns about minimally processed food rank at seventh place<sup>3</sup>. Moreover, respondents feel that the main *ex aequo* characteristic of a sustainable food is that it is "nutritious and healthy". The absence or the low quantity of pesticides used to produce food is the second most important characteristic of a sustainable food, according to the respondents, followed by the affordability of food products.

# 2 What should a nutrition label look like?

IFOAM Organics Europe believes that the proposal of the Commission to add a harmonized front-of-pack (FOP) label alone will not be sufficient to provide consumers with a comprehensive understanding of the risks coming from an unhealthy diet and therefore will not provide an effective and permanent solution to overweight, obesity and other noncommunicable diseases (NCDs) linked to unhealthy diets.

Moreover, IFOAM Organics Europe believes that a nutrition label alone will not be the solution to the health crisis we are faced with today, given that a FOP nutritional label must form part of a wider systemic health strategy that takes into account the complexity of food environments. For instance, in addition to raising awareness of healthy and nutritious foods from an early age and the affordability and availability of such products, there must be a follow up to nutrition-related policies, including verifying their correct implementation and making sure that success of these policies does not rely solely on individual behaviour

---

<sup>1</sup> European Commission. Farm to Fork strategy, available [here](#).

<sup>2</sup> European Commission. Health promotion and disease prevention knowledge gateway. Available [here](#).

<sup>3</sup> Page 5 of the Eurobarometer 505 "Making our food fit for the future" by the European Commission (2021) available [here](#).

changes, but also shapes external influences<sup>4</sup>. In this section we will explore the characteristics that a FOP nutrition label at EU level shall have. For instance, and importantly, it is important for a nutritional label to provide an indication of the healthiness of a certain product, as well as its naturalness.

## 2.1 The bigger picture and organic farming

The Farm to Fork strategy calls for a fair, healthy and environmentally friendly food system, and rightly makes the case for a systemic approach when it comes to food systems, taking into account the linkages between nutrition, health and the environment. The need to include natural systems within the field of public health has been developed and reaffirmed by several scientists in the last decade, such as in the report of the EAT-Lancet Commission<sup>5</sup>, calling for a transformation of the whole food system to achieve Planetary Health Diets<sup>6</sup> for the global population.

Through for instance intensive farming methods, the use of synthetic fertilizers and pesticides, and monocultures, the current food system has a strong impact on several planetary boundaries such as nitrogen and phosphorous flows, loss of biodiversity, water consumption and greenhouse gas emissions, pushing these boundaries beyond zone of uncertainty and putting the population at a high-risk<sup>7</sup>.

The organic market in the EU is still growing<sup>8 9</sup> and does not show signs of slowing down. This shows consumer support for more extensive production methods and for organic specifically. At the heart of organic farming are the four principles of health, ecology, fairness and care, which recognise the interlinkages between human health and preservation of the environment. According to these principles, the health of individuals and communities cannot be separated from the health of ecosystems; therefore, organic agriculture manages the natural resources in a precautionary and responsible manner to protect the health and well-being of current and future generations and the environment. In light of the above, it is important to keep in mind that a nutritious and healthy diet must exist within the planetary boundaries, and that organically grown food can be part of the solution.

## 2.2 The Nutri-Score: a well-intentioned approach, with shortcomings

In this paper we will address the Nutri-Score more closely as it is a label already used at private level in several Member States. The Nutri-Score gives an interpretation to consumers of the ingredients list available on the back of pack to a summarized version on the front-of-pack which ranks different food products from A (green – highest score) to E (dark red – lowest score). This scoring takes into account the calorie intake, the content of the four nutrients to limit (fat, saturates, sugars, salt) as well as those to support (vegetables, fruits, legumes, fibers, nuts, some oils and proteins). If this may seem like an easy, informative tool, the use of the Nutri-Score alone has some limitations.

It is important to look at unhealthy diets as a whole, and not at unhealthy products alone. The Nutri-Score assesses the nutritional profile of each product in isolation, without any indication on their quantity in a meal or their specific use. This can be misleading, because some products are not meant to be consumed by themselves but combined with others. In small quantities, they can contribute to a healthy diet, but the metric used by the Nutri-Score, 100 g or 100 mL, may be misleading as it is not representative of the use of the product in the diet or in a serving. For instance, we do not drink 100 mL of olive oil as it is consumed in small

---

<sup>4</sup> The Multibank Quarterly, 2021. Is obesity policy in England fit for purpose? Analysis of government strategies and policies 1992-2020. Available [here](#).

<sup>5</sup> Co-chaired by Prof. Walter Willett and Prof. Johan Rockström, the EAT-Lancet Commission brought together 19 Commissioners and 18 co-authors from 16 countries in various fields including human health, agriculture, political science and environmental sustainability. Find the summary report [here](#).

<sup>6</sup> The Planetary Health Diet is a global reference diet for adults that is represented by half a plate of fruits and vegetables and half a plate of wholegrains, plant proteins, unsaturated plant oils, modest amounts of meat and dairy, and some added sugars and starchy vegetables. More information [here](#).

<sup>7</sup> Campbell, B. M., D. J. Beare, E. M. Bennett, et al. 2017. Agriculture production as a major driver of the Earth system exceeding planetary boundaries. *Ecology and Society* 22(4):8. Available [here](#).

<sup>8</sup> Page 15 of the report "Organic sector in the European Union" by the Agence Bio (2021) available [here](#)

<sup>9</sup> Fibl, the World of Organic Agriculture, 2022. Available [here](#).

quantities per serving (around 10 mL). While a standard reference value is necessary to ensure comparability and transparency within the individual categories, it is important to provide consumers with the tools to understand the metric and the ranking linked to it.

Moreover, it is important to highlight that this label can only be used to compare products in the same category, although this limitation is not signalled to consumers. As such, Nutri-Score can help consumers in choosing the product with the best nutritional content, but they must be aware that comparing different categories of products is not foreseen with the Nutri-Score.

Given the scoring of the Nutri-Score and the inter-category comparison is not foreseen, FOP labels such as the Nutri-Score have consumers believe that some products are simply “bad” or “good” without providing much context. This simplification may be dangerous and will not address the concern of misinformation on nutrition-related knowledge nor the need to consider food environments as a whole when devising nutrition-related policies. In this respect, the simplification of a food product to one letter is not a desirable option; the interpretation of the “healthiness” of a product should be conveyed in a more comprehensive manner.

Moreover, the Nutri-Score does not consider an essential aspect of food products, namely their naturalness. The naturalness of a certain food product can be conveyed by taking into account certain indicators, such as the number of additives and the level of processing. Indeed, the Nutri-Score does not consider whether a certain product includes additives such as sweeteners and thickeners. These elements do not fall into the four types of nutrients that the Nutri-Score calculation considers, so their presence, even in high quantities, will not have any effect on the Nutri-score. Informing consumers about their presence is important: besides having important and functional purposes, many additives are also added to replace more expensive elements in a food product, or to make up for ingredients that have been lost in the production process and in that way mislead the consumers about the quality of the product they are eating or drinking<sup>10</sup>. These types of additives are also a good indicator that a product falls into the category of ultra-processed food<sup>11</sup>, a type of food that is linked with NCD, as we will see later. Therefore, it seems very important that a FOP label which aims to give nutritional indications to consumers considers the naturalness of a product as it is an indicator of the quality of the product. Currently however, given that the Nutri-Score does not take into account this aspect of food products, mass-manufactured white bread scores an A, an ultra-processed fizzy beverage with artificial sweeteners scores a B in the Nutri-Score<sup>12</sup> and a barely processed apple juice scores D<sup>13</sup>. We welcome the improvements announced in the yearly report from the Scientific Committee of the Nutri-Score 2021<sup>14</sup> that will amend the algorithm and hopefully allow for e.g. a better differentiation between wholemeal products and white flour. However, it seems that the question of additives will not be considered during this revision.

Finally, it seems increasingly so that the Nutri-Score is used more as a marketing tool than solely as a label providing nutritional information, given the presence of price reductions and promotions that push consumers to buy products that score A or B, e.g. the new fidelity program launched by the Belgium supermarket chain Delhaize which gives financial incentives to buy products labelled A or B with the Nutri-Score<sup>15</sup>. Given the limitations mentioned above, a legitimate concern arises on whether consumers will be directed to products ranked A and B without any other context on diets in general.

### **2.3 The NOVA classification: looking at the processing level of foods**

FOP labels such as the Nutri-Score do not examine the level of processing of food products. In contrast, the NOVA classification system put in place by the FAO “groups all foods according to the nature, extent and purposes of the industrial processes they undergo”. NOVA classifies all foods into four groups, depending on

---

<sup>10</sup> Tandalayo Kidd, Assistant Professor, Department of Human Nutrition; Kansas State University; The roles of food additives; September 2010 Available [here](#).

<sup>11</sup> Monteiro, CA.; Cannon, G.; Levy, RB.; Moubarac, J-C.; Louzada, ML.; Rauber, F.; et al (2019). Ultra-processed foods: what they are and how to identify them. *Public Health Nutrition* 2019, 22, 936-941, available [here](#).

<sup>12</sup> Open Food Facts is a non-profit citizen project created by thousands of volunteers around the world to collect data from food. It allows to find the Nutri-score and the Nova classification of thousands of products. More information [here](#).

<sup>13</sup> From Open Food Facts, see footnote 12. More information [here](#).

<sup>14</sup> Yearly report from the Scientific Committee of the Nutri-Score 2021, available [here](#).

<sup>15</sup> Delhaize Press Release 7 September 2021. Delhaize and Unbox launch the Healthy Membership Program for companies and organizations. Available [here](#).

their degree of processing - ultra-processed foods<sup>16</sup> are of particular importance in this context. The consumption of ultra-processed foods is already a big part of the total dietary energy consumed in high-income countries and is increasing strongly in middle income countries<sup>17</sup>. It has been shown that the consumption of this type of food is associated with diets of poor nutritional quality and therefore an increase of the risk of several non-communicable diseases, including obesity, depression, gastro-intestinal disorders, cardiovascular and metabolic diseases, and even cancer<sup>18</sup>. Moreover, the environmental impact of ultra-processed foods starts to be analysed and shows a strong weight of this type of food in greenhouse gas emissions, water footprint and ecological footprint<sup>19</sup>. For these reasons, IFOAM Organics Europe believes that considering the NOVA food classification system within the discussion about FOP nutrition labels is essential, keeping in mind that any FOP label must be part of a wider reform of the food environment. This classification has the advantage of providing information to consumers that is not already listed, therefore having a real added value to the current regulations, altogether with giving a better indicator of the naturalness of the ingredients in the products and provide a reliable framework on industrial food that is much needed for the consumers. While the category of ultra-processed food is usually not well ranked in the Nutri-Score, a study published in August 2021 showed that, on the range of products marketed in Spain, 26% of the products ranked A by the Nutri-Score are considered as ultra-processed foods by the NOVA classification<sup>20</sup>. The NOVA system could be used as an add on to the NutriScore or perhaps as an alternative to it. For instance, it has been proposed to add a part of the NOVA classification to the Nutri-Score by adding a dark border around the letter to indicate an ultra-processed food<sup>21</sup>.

### 3 Conclusions

It is not only a matter of unhealthy foods, but a matter of unhealthy diets, driven by a more general food environment. While IFOAM Organics Europe welcomes the initiative of the Commission to address the issue of the rise of NCDs diseases, an additional FOP label alone will not provide a solution to overweight and obesity. Raising awareness about nutrition, different methods of production, and the degree of processing will be far more useful to consumers in the long term. Keeping in mind that all these initiatives, labelling and consumer education, must be implemented in a more general context of a real and broad transformation of the food environment.

Finally, IFOAM Organics Europe would like to put forward the NOVA classification as this tool can provide elements regarding the degree of processing of a certain food product.

---

<sup>16</sup> The NOVA classification sees ultra-processed foods as follows: “ultraprocessed foods, is made up of snacks, drinks, ready meals and many other product types formulated mostly or entirely from substances extracted from foods or derived from food constituents. Ultra-processed foods are made possible by use of many types of additives, including those that imitate or enhance the sensory qualities of foods or culinary preparations made from foods.” Available [here](#), page 7.

<sup>17</sup> Page 7 of the report “Ultra-processed foods, diet quality, and health using the NOVA classification system” by FAO (2019) available [here](#)

<sup>18</sup> Pages 24-32 of the report “ultra-processed foods, diet quality, and health using the NOVA classification system” by FAO (2019) available [here](#)

<sup>19</sup> Jacqueline Terezada Silva, Josefa Maria Felleger Garzillo, Fernanda Rauber, et al. Greenhouse gas emissions, water footprint, and ecological footprint of food purchases according to their degree of processing in Brazilian metropolitan areas: a time-series study from 1987 to 2018, *Lancet*, 5 (2021), pp. 775-785, available [here](#)

<sup>20</sup> Romero Ferreiro, C.; Lora Pablos, D.; Gómez de la Cámara, A. (2021). Two Dimensions of Nutritional Value: Nutri-Score and NOVA. *Nutrients* 2021, 13, 2783, available [here](#)

<sup>21</sup> NutriScore, 2021. “Nutri-Score and other health dimensions of foods: how to better inform consumers?”. Available [here](#).