Working for organic farming in Europe



International Federation of Organic Agriculture Movements – EU Regional Group

To:

President: Francis Blake

Director: Marco Schlüter

European Office Rue du Commerce 124 1000 Brussels Belgium

Phone: +32-2-280 12 23 Fax: +32-2-735 7381 Email: info@ifoam-eu.org Basil Mathioudakis DG Sanco, Head of Unit E4 Food law, nutrition and labelling Rue Breydel 4 B-1049 Brussels Belgium

Brussels 12 November 2008

Nutrition labeling

Dear Mr Basil Mathioudakis,

The IFOAM EU Group (1) welcomes the efforts of the EU Parliament and the EU Commission to improve nutrition information towards consumers. We are in favour of replacing the voluntary requirements on "nutrition labelling" by a mandatory concept as it is proposed in the draft document (COM(2008) 40).

We are, however, concerned of the outcome of the ongoing debate on whether to introduce either a EU nutrition "<u>information</u>" system or a food preference "<u>recommendation</u>" system (in the form of the "traffic light" concept).

We find the "traffic light" system problematic because it recommends a certain selection of products to the consumer, based on very basic main contents of food and therefore is not able to provide a useful quality recommendation for consumers!

The organic sector promotes a holistic quality view on food that includes aspects such as natural vitamins, vital quality, animal welfare, fair traded etc: The 'traffic light' system does not consider such qualities but on the contrary gives preference to fat-reduced, artificially sweetened, fibre enriched and highly processed foods. In the worst case, it gives the impression that highly processed industrial products are healthier than natural food e.g. highly processed fat reduced spreads vs. natural butter; Coca Cola light vs. natural apple juice.

Seen as such, the traffic light system is a "misleading claim", ignoring crucial information about the product, and we strongly oppose to this. The traffic light system alone will not be helpful in fighting obesity!

We believe that it would be far more efficient to inform and educate consumers to enable them to make sound choices for themselves.



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Phone: +32-2-280 12 23 Fax: +32-2-735 7381 Email: info@ifoam-eu.org We ask you to take our consideration into account by putting your emphasis on establishing an <u>information system</u> for nutrition labelling and not preference recommendations based on some nutrients that do not mirror the whole picture of food quality.

We remain available for further information and assistance on the issue, should you require so.

With best wishes,

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Francis Blake, President

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Notes:

(1) The IFOAM EU Group represents the 330 member organisations of IFOAM (International Federation of Organic Agriculture Movements) in the EU, EFTA and the candidate countries and our member organisations include: consumer, farmer and processor associations; research, education and advisory organisations; certification bodies and commercial organic companies, thereby broadly representing the organic sector in Europe.