

Position Paper on Front-of-Pack Nutrition Labelling

Introduction

Fedima and its members, as part of FoodDrinkEurope, strongly support the objective of a **harmonised front-of-pack nutrition labelling system at EU level** pursued by the European Commission, as announced in its Farm to Fork Strategy for Sustainable Food, published on 20 May 2020, which has the intention of, amongst other things, the promotion of sustainable food consumption by providing better food information. Fedima and its member organisations are operating halfway through the supply chain, between 'farm' and 'fork'. They are at the **crossroads between production and consumption** of bread and patisserie, and are therefore, well placed to work towards a more **sustainable bakery and patisserie industry** by supporting initiatives that fit the purpose of **realising the United Nations' Sustainable Development Goals**. The association and its members are committed to further improving **transparency** and the **provision of clear, factual and relevant information** on the path towards more **sustainable food systems** while providing **nutritious products** to be consumed as part of a balanced and sustainable diet.

Fedima's position

General principles of an empowering front-of-pack nutrition labelling system

Several voluntary front-of-pack nutrition labelling systems are currently in use within the European Union¹. In this regard, Fedima and its members stress the importance of a **harmonised and unique front-of-pack nutrition labelling system at EU level** so as to avoid confusion for consumers, and to allow them to make **informed food choices**. Being positioned halfway through the supply chain and serving multiple countries and clients, systems that are based on divergent calculation methods would jeopardise a **smooth functioning of the Single Market**. Moreover, Fedima and its members believe that only a harmonised front-of-pack nutrition labelling system which is supported by a **calculation method** that is **objective, science-based** and **transparent** can empower consumers to shift towards more balanced and sustainable diets that are in line with the objectives of the Farm to Fork Strategy.

Scope of the front-of-pack nutrition labelling system

Fedima would like to highlight that **all food chain stakeholders** should be considered when developing a harmonised front-of-pack nutrition labelling system. In particular, the implications of the chosen calculation method should be considered carefully in the **Business-to-Business (B2B) context**. In this respect, Fedima

¹ Storcksdieck genannt Bonsmann, Stefan; Marandola, Ginevra; Ciriolo, Emanuele; van Bavel, Rene; Wollgast, Jan (2020): JRC Overview of Front-Of-Pack (FOP) schemes providing nutrition information. European Commission, Joint Research Centre (JRC) [Dataset] PID: <http://data.europa.eu/89h/ee4aa355-2e2f-4419-a1ee-b2041eda1486>

members serving B2B have a **specific activity and role**, which is that of **enablers**. Indeed, the recipes that B2B companies provide ought to be considered as **guidelines for** helping customers to formulate recipes and products in such way as to have **various nutritional compositions**. This provides consumers with equally varied finished products, thus allowing them to express their **preferences** in nutritional composition. In light of these considerations, Fedima would like to point out the possible **undue accountability** on B2B enablers in the value chain should customers and consumers diverge from the provided recipe, independent of Fedima members' will.

Front-of-pack nutrition labelling and healthy diets

Fedima members welcome a harmonised front-of-pack nutrition labelling system as a means for consumers to make informed choices that fit their individual diets and lifestyles.

Fedima would like to highlight that **moderate consumption** of indulgence products is **compatible with healthy and balanced diets**. Indeed, while foods such as bread have been recognized for their undeniable highly **nutritious qualities** and essential part in a healthy and balanced diet, other types of foods such as fine bakery wares, like cakes and cookies, provide consumers with **pleasure and comfort** and have a different consumption frequency and purpose. This specific **purpose** and **consumption frequency** should therefore be taken into account.

Portion sizes and **calorie intakes** also play an important role, along with individual nutrients, in the adoption of healthy and balanced diets, and should also be considered. In that regard, Fedima members and the industry can provide **guidance** to customers and consumers on portion size and calorie reduction.

Challenges in the reformulation of recipes

The association and its members are committed to provide products to be consumed as part of a balanced and sustainable diet and, where possible, work on improving their recipes on a nutritional basis. However, Fedima would like to highlight that some recipes require the use of specific food ingredients. Certain ingredients, such as fat, sugar or salt, provide **specific technical functions**, as well as **traditional and cultural** aspects in bakery products and fine bakery wares, rendering their **replacement or reduction complex**. Moreover, reductions can be limited by traditional and cultural aspects in bakery products and fine bakery wares. For example, Fedima and its members would like to point out that there are **limitations to the formulation** of products such as those registered with Protected designations of origin and Protected geographical indications, as well as a prohibition by the current Additive regulation² for the use of intense sweeteners as substitutes for sugar in fine bakery wares. Finally, current Food Information to Consumers³ and

² Regulation (EC) No 1333/2008 of the European Parliament and of the Council of 16 December 2008 on food additives, (OJ L 354 31.12.2008, p. 16)

³ Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers

Nutritional and Health Claims⁴ regulations are hindering the possibility for the industry to communicate to customers and consumers the **smaller improvement steps** that, although improving the nutritional composition of products, **cannot be made visible**.

Fedima calls on all of these elements to be taken into account in the upcoming regulation on a harmonised front-of-pack nutrition labelling.

Approved by the Fedima Board on May 19, 2021

⁴ Regulation (EC) No 1924/2006 of the European parliament and of the council of 20 December 2006 on nutrition and health claims made on foods