

Position Paper on Nutrient Profiles

Introduction

Fedima is strongly committed to improving **transparency** and the **provision of clear, factual and relevant information**, while providing **nutritious products** to be consumed as part of a balanced and sustainable diet. The association and its members thus support the revision of the European Commission's Regulation (EU) No 1169/2011 on food information to consumers ('FIC Regulation')¹ as part of its Farm to Fork strategy published in May 2020².

As Business-to-Business (B2B) operators, Fedima members operate halfway through the supply chain, between 'farm' and 'fork'. This position at the crossroads between production and consumption of bread and patisserie, allows them to be well placed to take action towards a more sustainable bakery and patisserie industry.

In this context, Fedima has already adopted positions on certain Farm to Fork topics, such as front-of-pack nutrition labelling³. With the same objective in mind, this Position Paper addresses the specific topics of nutrient profiles and nutrition in general.

Fedima welcomes the opportunity to contribute to the development of a nutrient profiling system and **supports a simple, harmonised, fit-for-purpose and science-based approach in that sense**.

Indeed, Fedima and its members are convinced of the need for more coordination at EU level in order to avoid the proliferation of national systems. The revision of the regulation should also be an opportunity to simplify the existing frameworks and to ensure clearer and more easily applicable rules. Finally, it is essential that the nutrient profiling model is based on concrete scientific data to ensure a correct classification of foods. This classification should be fit-for-purpose and therefore propose different types of restrictions depending on the different types of nutrient profiles.

¹ 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 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02011R1169-20180101>

² Communication from the Commission to the European Parliament, the Council, the European economic and social committee and the committee of the regions, A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system, COM/2020/381 final <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020DC0381>

³ Fedima Position Paper on Front-of-Pack Nutrition Labelling, April 2021
https://www.fedima.org/images/resources/informed-customers-consumers/2104_FoP_Nutrition_Labelling_Position_paper.pdf

Fedima's position

General principles of empowering nutrient profiles

Fedima and its members welcome the Commission's efforts to **stimulate sustainable food processing and reformulation**, as well as its commitment to **further empower consumers through labelling**. In the context of the Farm to Fork strategy, however, the association and its members believe that nutrient profiles and the proposal for a harmonised front-of-pack nutrition labelling should be considered as two different initiatives with distinct objectives. Although they are complementary, Fedima stresses the importance of treating them separately. The establishment of nutrient profiles, for its part, should meet the following principles: **harmonisation, simplicity and validity**.

Indeed, the associations and its members have witnessed a sharp increase in national initiatives approaches to nutrition labelling in the EU in recent years. These initiatives undermine the proper functioning of the single market and can be confusing for consumers. In this context, Fedima and its members believe discussions on this potential adoption should be harmonised at EU level. Furthermore, should a nutrient profiles system be adopted, Fedima favours a regulation as legislative vehicle to support this scheme.

Fedima also stresses the importance of **simplifying the existing frameworks** and establishing a **more readable** model based on a simple structure. First, to ensure a better understanding by consumers. Second, to make the establishment of nutrient profiles **easier to implement** and encourage food manufacturers to improve the nutritional value of their products. Indeed, the more components are included, the more complex the nutrient profiling system becomes in its application.

Finally, the association and its members believe that these profiles should be based on concrete and consensual scientific data from both EFSA and other independent bodies while ensuring a correct classification of foods, **reflecting the purpose** for which the model has been developed. Therefore, Fedima and its members welcome the Commission mandate for EFSA to deliver an Opinion on the setting of nutrient profiles. In this respect, attention should also be brought on the impact assessment of the setting of these nutrient profiles. Indeed, as pointed out by the Joint Research Centre⁴, **further research on the effectiveness of measures** such as food reformulation strategies, should be conducted as to ensure they are the most adequate ones to achieve the objectives of healthier and more balanced diets. Achieving this objective through a restriction of health claims also requires sufficient incentives and room for operators to communicate about efforts made.

⁴ Moz-Christofolletti, M.A.; Wollgast, J. Sugars, Salt, Saturated Fat and Fibre Purchased through Packaged Food and Soft Drinks in Europe 2015–2018: Are We Making Progress? *Nutrients* 2021, 13, 2416, <https://www.mdpi.com/2072-6643/13/7/2416>

Fedima thus calls for the Commission to explore different restriction possibilities as well as an exemption for gradual improvements of nutritional composition to be included in the nutrient profiles system.

Scope of the nutrient profiles

The European Commission's Farm to Fork Strategy for Sustainable Food targets the entire food chain. Therefore, Fedima highlights the importance of taking into account the specificities of all actors in the food chain when developing a nutrient profiling system. The classifications and thresholds supporting this system should be considered carefully in the **B2B context** and with regard to the specific facilitating role played by B2B operators.

The recipes provided by these operators should be seen as guidelines allowing customers to provide **various compositions** when formulating their products, and **consumers to express their preferences for equally diverse finished products**. B2B operators do not directly control how their products will be used and whether the provided recipes are followed by their customers. The nutritional compositions of products may thus differ between B2B and B2C levels, independent of B2B operators' intentions. In this context, the association highlights the possible **undue accountability** on B2B enablers in the value chain, should customers and consumers deviate from the usage suggestion provided.

Nutrient profiles and healthy diets

Fedima and its members are committed to provide **nutritious products** to be consumed as part of a sustainable and balanced diet. In that sense, the association and its members highlight the fact that such diets are compatible with a moderate consumption of indulgence products, and call for a **holistic and adapted approach** at European level.

Indeed, while it is obvious that some foods contribute more than others to this balance, it is also true that any food can be included in a healthy diet, provided that the **frequency** and **quantities consumed** are adapted to the nutritional characteristics of the food. **Portion sizes** and **calorie intakes** also play an important role, along with individual nutrients, in the adoption of healthy and balanced diets.

Finally, it should not be forgotten that the foods we consume on a daily basis serve different purposes: **nutritional** but also **cultural** or **social**. While foods such as bread have been recognised for their undeniable highly **nutritional qualities** and essential role in a healthy and balanced diet, other types of food such as fine bakery wares, like cakes and cookies, provide consumers with **pleasure and comfort** and are consumed at different frequencies than other types of products. Similarly, **dietary patterns** and therefore nutrient intake levels **vary between countries**, **availability of food products**, and **cultural characteristics** as noted by EFSA in its

[draft] Scientific Opinion advising on the development of harmonised mandatory front-of-pack nutrition labelling and the setting of nutrient profiles for restricting nutrition and health claims on foods⁵.

These elements must therefore be taken into account in the establishment of nutrient profiles if a successful and appropriate model is to be achieved. The association and its members also underline the need to ensure scientific credibility and a **holistic approach** that recognises the positive role that all foods can play in a balanced diet. To do so, **further scientifically validated consumer research** may be needed. Any reference to **unscientific terminology** like "healthy" and "unhealthy" foods, should also be avoided as it gives a false and misleading message to consumers. Finally, the emphasis should also be on **education from an early age**, rather than dictating to consumers what they should or should not eat. All in all, regulation should establish general and shared guidelines, but it should be adapted to the different needs of consumers across the European Union.

Achieving more nutritious products

Fedima commitment

Fedima and its members are committed to providing nutritious products to consumers. Bakery products can contribute to balanced diets thanks to certain of their ingredients. Whole grains for instance are known for their contribution to fibre and minerals intake/consumption, and are also a significant source of plant protein. The consumption of these specific ingredients is therefore widely promoted by Fedima through information campaigns and the development of a common understanding of the sector.

The association therefore welcomes and supports the EFSA's conclusion that **fibre intakes**, notably based on **whole grains consumption**, is **encouraged** in European diets⁶. Nevertheless, Fedima underlines the fact that the **health benefits of whole grains** go beyond their fibre content, as supported by EFSA's conclusion as well. Indeed, wholegrains contain more iron, magnesium, manganese, phosphorus, potassium, selenium and zinc, as well as vitamins B and E, and polyphenolic phytochemicals, such as phenols, flavonoids and carotenoids. The use of fibre as a surrogate marker for wholegrain fruit and vegetable intake does not reflect the intrinsic positive role of these ingredients (foods) in the diet.

In this context, and given the insufficiency of the current consumption of wholegrain according the World Health Organisation (WHO) and the Food and Agriculture Organization of the United Nations (FAO)⁷, as well as the European Commission's Farm to Fork Strategy, Fedima calls for whole grains to be **included in the list of food groups with important and specific dietary roles in European diets**.

⁵ Scientific advice related to nutrient profiling for the development of harmonised mandatory front-of-pack nutrition labelling and the setting of nutrient profiles for restricting nutrition and health claims on food, doi: 10.2903/j.efsa.2022.7259

⁶ Idem 5.

⁷ FAO and WHO. 2019. Sustainable healthy diets – Guiding principles. Rome, <https://www.fao.org/3/ca6640en/ca6640en.pdf>

In this context, the association welcomes and highlights initiatives such as the Danish Whole Grain Public–Private Partnership⁸ contributing to raising the average whole grain intake, and the EU funded Dutch Bakery Centre led initiative to promote wholemeal bread as an important and nutritious local food⁹.

The sector has also undertaken wider reformulation and innovation in order to improve the nutritional composition of products and reduce their sugar, salt and fat levels.

Recipes reformulation challenges

While 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, Fedima would like to highlight the challenges it faces in that regard.

Indeed, technological constraints can limit the reformulation efforts of Fedima and its members, as the use of certain specific ingredients is required in certain recipes. The **specific technical functions** and the **traditional** and **cultural** aspects of ingredients such as fat, sugar and salt, in bakery products and fine bakery wares, can render the **replacement or reduction of the ingredients, complex**.

Furthermore, **regulatory limitations** to formulation of products, such as the prohibition by the current Additive regulation¹⁰ of the use of intense sweeteners as substitutes for sugar in fine bakery wares, must be pointed out. Current Food Information to Consumers¹¹ and Nutritional and Health Claims¹² regulations are also hindering the possibility for the industry to communicate to customers and consumers the **progressive advances** that, although improving the nutritional composition of products, **cannot be made visible**. Yet, a **one-step reduction is not acceptable to consumer's taste, rather it is a gradual adaptation that makes product reformulation palatable and thus successful** .

For this reason, the association and its members believe that there should always be **room to communicate** on the efforts made and that producers and manufacturers should be allowed to inform consumers on the **gradual improvements** of their recipes without having to wait for the end of the process. Fedima therefore encourages the authorities to explore the different possibilities of restrictions and to allow **exemptions** or **adaptations in case of progressive improvement of the nutritional composition** of certain products.

Food reformulation is an essential part of a comprehensive approach to providing healthier food. Due to technological constraints and regulatory limitations, however, food reformulation **requires a significant amount of time** and **commitment** from producers. Fedima calls on all of these elements to be taken into account in

⁸ <https://fuldkorn.dk/english/>

⁹ <https://www.brood.net/nieuws/>

¹⁰ 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) <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1333-20210808>

¹¹ Idem 1

¹² 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 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02006R1924-20141213>

the upcoming regulation on nutrient profiles in order to ensure that the efforts made by food business operators are not wasted and insists on the need to put in place strong **incentives** for the industry.

FEDIMA COMMITMENTS

Situated at the **crossroads between production and consumption** of bread and patisserie industry, Fedima and its members, within the framework of FoodDrinkEurope, are continuously acting in favour of a more **sustainable bakery and patisserie industry**. This is reflected through the support of various initiatives in line with the **United Nations' Sustainable Development Goals**, such as the European Commission's Farm to Fork Strategy for Sustainable Food, published on 20 May 2020, to further empower consumers through labelling information.

In addition to the initiatives it supports, Fedima, as a Member of FDE, is de facto a signatory of the **EU Code of Conduct on Responsible Food Business and Marketing Practices**. Together with external stakeholders and industry partners, through all these commitments, Fedima daily strives to provide quality products, ensure greater transparency and provide more information to customers and consumers.

STUDIES:

BREAD IN HEALTHY DIETS

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Thielecke, F., Lecerf, J., & Nugent, A. (2021). Processing in the food chain: Do cereals have to be processed to add value to the human diet? *Nutrition Research Reviews*, 34(2), 159-173. Accessed through: <https://www.cambridge.org/core/journals/nutrition-research-reviews/article/processing-in-the-food-chain-do-cereals-have-to-be-processed-to-add-value-to-the-human-diet/E00107B8116CF907009D5E15CBE94191>

Dagfinn, A., NaNa, K., Edward, G., Fadnes, L. T., Boffetta, P., Greenwood, D. C., Tonstad, S., Vatten, L. J., Riboli, E., Norat, T. (2017). Whole grain consumption and risk of cardiovascular disease, cancer, and all cause and cause specific mortality: systematic review and dose-response meta-analysis of prospective studies. *BMJ*, 353(2716). <https://www.bmj.com/content/bmj/353/bmj.i2716.full.pdf>

Weegels, P. L. (2019). The future of bread in view of its contribution to nutrient intake as a starchy staple food. *Plant Foods for Human Nutrition*, 74(1), 1-9. <https://pubmed.ncbi.nlm.nih.gov/30637605/>

RECIPES REFORMULATION

Buttriss J. L. (2013). Food reformulation: the challenges to the food industry. *The Proceedings of the Nutrition Society*, 72(1), 61–69. Accessed through: <https://www.cambridge.org/core/services/aop-cambridge-core/content/view/65312FF335A28B3F6050037251F0F61B/S0029665112002868a.pdf/food-reformulation-the-challenges-to-the-food-industry.pdf>

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