



EAPF Position on the Revision of the EU Food Information to Consumers Regulation

Brussels, 2 February 2021

Regulation (EU) No 1169/2011 on the provision of food information to consumers (FIC Regulation) has been instrumental in establishing a harmonised framework for food labelling in the EU. It has also significantly helped consumers make better-informed choices, setting up clear rules for providing nutritional information about food products.

Owing to its positive impacts on consumers and on the EU food market, the European Alliance for Plant-based Foods (EAPF) supports the European Commission's ambition to further strengthen the FIC Regulation and align it with the objectives of the EU Farm to Fork Strategy for a transition to healthy and sustainable food systems.

EAPF welcomes the opportunity to contribute to the public consultation on the Inception Impact Assessment (IIA) on the proposal for a revision of the FIC Regulation. While we deem existing legislation fit for purpose, some of its initial dispositions have not been addressed up to now and deserve policymakers' attention.

In this paper, EAPF provides its views on:

- **Front-of-pack nutrition labelling** – as part of the key aspects considered for revision;
- **Information related to the suitability of foods for vegetarians and vegans** (Art. 36(3)(b));

Front-of-Pack (FOP) Nutrition Labelling

Nutrition labelling is instrumental in helping consumers make 'health-conscious food choices'. This is part of the [2020 JRC Front-of-Pack Labelling Report](#), which concludes that FOP labelling supports efforts to prevent diet-related non-communicable diseases. Nonetheless, several nutrient profiling schemes currently exist across Europe, which are based on diverging principles and methodologies (the Keyhole, Nutri-Score, traffic lights, NutrInform).

EAPF welcomes the Commission's ambition for an EU-wide harmonised approach to FOP nutrition labelling that would provide consumers with easy-to-understand, non-misleading information about the nutritional characteristics of foods. The concept of nutrient profiles was introduced in relation to health and nutrition claims, with the intention to avoid abusive marketing practices (including towards children) and encourage reformulation.



Notwithstanding that, they should also provide **complete, transparent information** about food products, taking into account all ingredients – beneficial components (e.g. vitamins, fibres, minerals, essential fatty acids) **and** nutrients to limit (sugar, salt, saturated fats) – rather than focusing merely on the latter. This is essential if we aim for FOP labelling to **properly inform and educate consumers about food and nutrition**.

Besides, FOP nutrition labelling should be **inclusive**. A harmonised EU FOP scheme should apply to all products. It should **avoid discriminatory practices** which may entail:

- Targeting specific food categories;
- Assessing products from the same functional category differently (e.g. meat/dairy products and plant-based alternatives);
- Contributing to diverging consumer perception of the same product across different regions of Europe.

Based on the above, EAPF would **support a common EU FOP scheme** provided that it observes the following common principles.

1. **Transparent.** The EU FOP scheme is key to helping consumers make informed decisions. It should thus be based on transparent nutrition information and objective criteria based on sound and robust scientific knowledge and evidence. Those criteria should be subjected to independent scientific assessment;
2. **Comprehensive.** The scheme should take into account the total nutritional value of the food – i.e. all nutrients – including both nutrients to limit (e.g. saturated and trans fats, sugar, salt) as well as nutrients to encourage (e.g. fibres, vitamins, minerals and essential fatty acids such as omega-3). Further, the EU FOP scheme should be *solely* based on products' nutritional composition, not on the presence of specific ingredients or production processes. Nutritional composition is the most important information in terms of health outcomes;
3. **Inclusive.** The EU FOP scheme should be non-discriminatory and cover all packaged foods – whether complex or single-nutrient foods – and assess them based on their contribution to a healthy diet. In the case of a qualitative FOP scheme, categories should be based on function/usage and should be defined as broadly as possible. The only way to achieve consumer awareness on nutrition is to facilitate objective comparisons between products in the same category;
4. **Consistent with existing nutritional guidelines and consumer surveys.** FOP labelling should not mislead the consumer to make choices that are against nutritional recommendations from health organisations (WHO ['A healthy diet sustainably](#)



[produced](#)', 2018) and national authorities and dietary guidelines (e.g. the 'Wheel of Five' in the Netherlands, the 'Nordic Nutrition Recommendations' in Sweden);

All stakeholders (industry, consumer groups, retail, nutritionists) should be involved in consultations towards defining the principles and criteria of the EU FOP scheme.

Foods suitable for vegetarians and vegans

According to Article 36(3)(b) of the FIC Regulation, the Commission was to adopt an implementing act setting requirements for the provision of voluntary food information related to foods suitable for vegetarians and vegans. Those rules have not been established up to now and are essential for consumers who follow a plant-based diet for environmental, health or ethical reasons.

The EU Farm to Fork Strategy even acknowledges the need to encourage *'[moving] to a more plant-based diet with less red and processed meat and with more fruits and vegetables [to] reduce not only risks of life-threatening diseases, but also the environmental impact of the food system'*¹. It is therefore reasonable for labelling schemes to provide information on which foods are vegetarian or vegan, to aid informed consumer decisions around plant-based foods.

More and more consumers are turning to vegetarian and vegan diets. However, and as stated in the 2016 [joint position of FoodDrinkEurope and the European Vegetarian Union](#), *'although the general idea of vegan and vegetarian foods (no animal products or no animal flesh, respectively) is uncontested, there can be differing interpretations when it comes to details. These can lead to obstructions of the free movement of goods and to contradictions in food labelling.'*

Besides consumer information, EU requirements on food suitable for vegetarians and vegans would provide a common marketing framework for the food industry and avoid diverging definitions across Member States. Recent work at international level – e.g. the soon-to-be-published ISO standard on definitions, technical criteria and labelling requirements for foods and ingredients suitable for vegetarians or vegans (ISO 23662:2020) – could serve as a basis for discussions on EU requirements.

EAPF is supportive of the definitions of 'foods suitable for vegans' and 'foods suitable for vegetarians' proposed by EVU and FoodDrinkEurope in their joint paper (see in Annex). We thus encourage the Commission to set the implementing act and establish clear rules for the food labelling.

¹ EU Farm to Fork Strategy, p. 13. https://eur-lex.europa.eu/resource.html?uri=cellar:ea0f9f73-9ab2-11ea-9d2d-01aa75ed71a1.0001.02/DOC_1&format=PDF



The European Alliance for Plant-Based Foods (EAPF) brings together like-minded organisations in the plant-based value chain around a unique mission: To put plant-based foods at the heart of the transition towards more sustainable and healthy food systems. The Alliance represents the entire plant-based value chain: Food producers and manufacturers, NGOs, nutritionists, research & academia, and consumers.

Annex

Proposed EVU and FoodDrinkEurope definitions of “food suitable for vegans” and “food suitable for vegetarians”

(1) Food suitable for vegans

Foods that are not products of animal origin and in which, at no stage of production and processing, use has been made of or the food has been supplemented with

- ingredients (including additives, carriers, flavourings and enzymes), or*
- processing aids, or*
- substances which are not food additives but are used in the same way and with the*

same purpose as processing aids, that are of animal origin.

(2) Food suitable for vegetarians

Foods which meet the requirements of paragraph 1 with the difference that in their production and processing

- 1. Milk and dairy products,*
- 2. Colostrum,*
- 3. Eggs (No. 5 of Annex I to Regulation (EC) No. 853/2004),*
- 4. Honey (Annex I to Directive 2001/110/EC),*
- 5. Beeswax,*
- 6. Propolis, or*
- 7. Wool grease including lanolin derived from the wool of living sheep*

or their components or derivatives may be added or used.

(3) A claim that a food is suitable for vegans or suitable for vegetarians is not precluded by unintended presence in the food of products which do not comply with the requirements of paragraphs 1 or 2, if and to the extent that this is unavoidable at any stage of production, processing and distribution, despite appropriate precautions being taken in compliance with good manufacturing practices.

(4) Paragraphs 1 to 3 shall apply accordingly if food information is provided which is synonymous with ‘food suitable for vegans’ or ‘food suitable for vegetarians’ from a consumer perspective.

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