



# EAPF Response to EFSA public consultation on Scientific Opinion on FOP labelling and nutrient profiles

Brussels, 4 January 2022

The European Alliance for Plant-based Foods (EAPF) welcomes the possibility to provide feedback on the EFSA draft scientific opinion on the “Development of harmonised mandatory front-of-pack nutrition labelling and the setting of nutrient profiles for restricting nutrition and health claims on foods”. **EAPF is supportive of 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. Such information should be complete, transparent and inclusive, allowing consumers to make conscious and well-informed food choices.** In this regard, we deem the EFSA scientific opinion crucial to inform on the development of an EU FOP labelling and on the setting of nutrient profiles.

## General Remark

- *Inclusion of plant-based products analogues to meat and dairy.* While welcoming the inclusion of plant-based ingredients as an important source of proteins (e.g. grain and grain-based ingredients, legumes and nuts – lines 759-763 p. 20), plant-based products analogue to animal-based ones (e.g. plant-based beverages) are nowhere mentioned in the draft opinion. Building on previous EFSA opinions<sup>1</sup> which include plant-based beverages within “Milk and dairy products including dairy alternatives”, **EAPF strongly suggests that EFSA includes plant-based products as part of the food groups addressed in this Opinion, within the same category as traditional meat and dairy.** That is because consumers use these products in the same modalities and contexts: for instance, plant-based beverages are used to prepare drinks that can also be made with dairy milk. Moreover, consumer demand for these products is increasing<sup>2</sup>, which further highlights the need to include these foods in the Opinion to ensure it is representative of today’s food consumption patterns.

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<sup>1</sup> EFSA draft scientific opinion on Tolerable Upper Intake Level of Dietary Sugar, 2021

<sup>2</sup>2021 Smart Protein Project: Plant-based foods in Europe: What do consumers want? <https://smartproteinproject.eu/consumer-attitudes-plant-based-food-report/>

## Remarks on Assessment

- *Total fat vs fat quality (lines 1416-1422, p. 34).* The draft suggests that total fat could replace energy in category-based nutrient profiling models for products that are relatively homogenous regarding fat quality, with milk and dairy products offered as an example. As the draft rightly mentions, total fat would not allow discrimination of foods based on the nutritional quality of their fat content. However, today's wide range of milk and dairy products does not have a homogenous fat quality as stated in the report. Moreover, there are plant-based products that present a different fat profile than their animal-based counterparts: the former are notably higher in unsaturated fatty acids (e.g. MUFA and PUFA) and lower in saturated fatty acids (SFAs) than the latter, which has proven to decrease the risk of cardiovascular diseases<sup>3,4</sup> (lines 528-531). **EAPF therefore strongly suggests that EFSA acknowledges that the category of "Milk and dairy products including dairy alternatives" greatly differs in terms of fat quality, for which a focus on the specific fat groups is needed to support a shift in consumption of SFAs towards more UFAs.**
- *Trans fats (lines 627-657, p. 17-18).* The draft Opinion rightly states that sources of TFAs can come from both animal-based products (e.g. dairy products) and plant-based products (e.g. partially hydrogenated oils). The plant-based fat industry invested heavily in product reformulation in the past decades to address the public health impact of TFAs, even before the setting of maximum levels in the EU. Today, plant-based fat products are fully compliant with the current legislation and do not represent a main source of TFAs: therefore, the statement made in lines 640-641 no longer applies. However, regulated intake of TFAs as highlighted in the draft Opinion (lines 643-657) applies **only** to industrial TFAs. Ruminant TFAs (present in dairy and meat) are not subject to any restriction, while having the same public health impact. **EAPF therefore strongly suggests that EFSA highlights this difference and clarifies the role of ruminant TFAs in the overall TFA intake.** This would support transparent consumer information.
- *Intake of added sugars from non-core foods (lines 684-690, p. 19).* The draft Opinion rightly states that "added and free sugars mainly originate from non-core food groups"

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<sup>3</sup> Kim H, Caulfield LE, Garcia-Larsen V, Steffen LM, Coresh J, Rebholz CM. Plant-Based Diets Are Associated With a Lower Risk of Incident Cardiovascular Disease, Cardiovascular Disease Mortality, and All-Cause Mortality in a General Population of Middle-Aged Adults. *J Am Heart Assoc.* 2019 Aug 20;8(16):e012865. doi: 10.1161/JAHA.119.012865. Epub 2019 Aug 7. PMID: 31387433; PMCID: PMC6759882

<sup>4</sup> Choi Y, Larson N, Steffen LM, Schreiner PJ, Gallaher DD, Duprez DA, Shikany JM, Rana JS, Jacobs DR Jr. Plant-Centered Diet and Risk of Incident Cardiovascular Disease During Young to Middle Adulthood. *J Am Heart Assoc.* 2021 Aug 17;10(16):e020718. doi: 10.1161/JAHA.120.020718. Epub 2021 Aug 4. PMID: 34344159; PMCID: PMC8475033.



(lines 689-690). Following EFSA's inclusion of plant-based dairy analogues within the core food group of "Milk and dairy products including dairy alternatives", **EAPF strongly suggests that EFSA clearly distinguishes the role of added/free sugars between various food groups**, promoting a more nutrient-rich diet within the EU population whilst decreasing intake of total sugars.

### Remarks on Conclusions

- *Food groups with important dietary role (lines 1444-1447, p. 35)*. As highlighted in the general remark, **EAPF strongly suggests that EFSA explicitly mentions plant-based products analogues to meat and dairy and includes them within their respective category based on products' functionality** (e.g. plant-based analogues to dairy would be inserted in the same category of traditional dairy), as consumers use them in a similar way.
- *Energy vs total fat (lines 1462–1467, p. 35)*. As highlighted in the previous remarks, given the variety of dairy products and analogues on the market, **EAPF strongly suggests that EFSA explicitly acknowledges that total fat as a generic proxy for energy intake would underemphasise the role of UFA's in the dietary intake**, and that it therefore **cannot be used in product categories with heterogeneous fat quality** (e.g. dairy products and plant-based analogues).

### Remarks on Appendix B

- *Nutrients intake (p. 52)*. Plant-based products are often fortified with vitamin D, B12, riboflavin and iodine (analogues to dairy) or iron (analogues to meat) supporting the intake of such nutrient within the EU population. For instance, vitamin D has been identified as the first nutrient with inadequate intake in 17 Member States, even if the majority of these countries have a national programme in place to address such deficiency. While dietary intake is not sufficient in certain situations, it can definitely be a support. Therefore, **EAPF suggests that the EFSA report takes into account that, given their composition, plant-based products analogues to traditional meat and dairy play a key role in contributing to intakes of several micro-nutrients, for which inadequate intakes in some population groups exist.**

*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.*