

Ref.: BEUC-X-2015-091/IPA/cm

Brussels, 7 April 2015

Re: EU nutrition policy

Dear Attaché,

In view of the forthcoming Informal Meeting of Health Ministers that will take place in Riga on 20-21 April, BEUC, the European Consumer Organisation, wishes to share with you its key demands on nutrition. With rates of obesity and diet-related diseases rising in many Member States, we call on governments to take bold actions to address the problem by:

- ***Promoting healthy and informed choices for all***

With a significant proportion of the EU population overweight or obese actions need to be focused on enabling healthier choices for all. It is important to promote healthy dietary practices but it is also necessary to allow consumers to make informed choices about individual products in order to balance their diets.

Consumers need to have clear, 'at-a-glance' and accurate information about the nutritional quality of foods. Front-of-pack color coding of nutrient levels can greatly improve consumers' awareness and help them identify healthier options. Moreover such labelling schemes encourage companies to reformulate their products and develop healthier options. Healthy choices should be the easiest choices and they should be affordable.

- ***Setting clear targets for reductions in fat, sugar and salt levels across foods categories***

At present, voluntary deals on reformulation have not led to a significant reduction of fat, sugar and salt levels in food. On the contrary BEUC members' tests revealed that levels have even risen in some products. Several national authorities have come to the same conclusion and called on the industry to make further efforts. However we firmly believe that only

clear targets can lead to a reduction of salt, sugar and fat levels and improve the nutritional composition of foodstuff. We expect public authorities to provide strong leadership and continue to work with all stakeholders in order to make concrete and effective steps forwards on reformulation.

- ***Introducing common EU binding restrictions on TFA***

Scientific evidence¹ clearly shows that industrially produced Trans Fatty Acids (TFA) have harmful consequences on consumers health, especially with regard to cardiovascular diseases. Despite repeated calls from scientific bodies including EFSA and WHO to remove these harmful fats from the food supply, recent surveys^{2,3,4,5} carried out by our members as well as studies published in leading medical journals revealed that alarming amounts of TFA can still be found in many pre-packed and takeaway products (e.g. margarine, biscuits, cakes, pizzas) and many consumers are still exposed to high levels of TFA. Labelling requirements and voluntary industry commitments failed to deliver the expected results. Therefore BEUC urges for the introduction of common EU legally binding restrictions on the use of TFA.

- ***Improving the risk assessment of food additives***

It is important that the public health benefits of reducing levels of fat, sugar and salt are not offset by an increased use of food additives. Indeed many food additives can trigger allergic reactions in sensitive consumers. Moreover, their combined health burden (so-called "cocktail" effect) is also not sufficiently appraised. As the re-evaluation of currently approved EU food additives is on-going, it is essential that proper methodologies are developed as a matter of priority for the cumulative risk assessment of food additives with a view to ensuring a high level of protection of consumers' health.

- ***Implementing tighter rules and controls over food marketing***

It is necessary to ensure responsible marketing and promotion of food products that are in line with dietary recommendations. This is particularly important with regard to children. Until now the food industry has generally committed to restrict advertising and marketing to kids via voluntary pledges. Member States should take the lead and implement rules that set harmonized nutrition criteria to determine whether products can be categorized as healthy or unhealthy and therefore submitted to marketing restrictions as set out in the EU Action Plan on Childhood Obesity. Member States should also endorse the WHO Europe recently published nutrient profiles model⁶ and use it as a basis for discussion with food industry bodies.

¹ EFSA Scientific Opinion on Dietary Reference Values for fats, including saturated fatty acids, polyunsaturated fatty acids, monounsaturated fatty acids, trans fatty acids, and cholesterol. EFSA 2010.

² Test-Achats, Analyse : Friteries, Janvier 2011.

³ Jedlé nejedlé tuky, D Test, November 2013, www.dtest.cz

⁴ Pizzas de jamon y queso refrigeradas, Organizacion de Consumidores y Usuarios (OCU), February 2012.

⁵ Test hořických trubiček a plněných oplatek, D Test, January 2014, www.dtest.cz

⁶ http://www.euro.who.int/__data/assets/pdf_file/0005/270716/Nutrient-Profile-Model.pdf?ua=1

- ***Monitoring the use of health and nutrition claims and sanction businesses who continue to use non-authorized claims***

Consumers should not be misled about the true nature of a product. The EU Regulation on Health and Nutrition claims aims to provide consumers with scientific-based information about the benefits of eating certain substances. As the list of authorized and non-authorized nutrition and health claims has been published companies are well aware if they can still make claims on their products. Yet many unauthorized claims remain on the market and consumers continue to be misled about the benefits of the food they buy. Member States' commitment to monitor the enforcement of the list and ban the use of unauthorized claims is critical as it ensures health messages are not available on products which are not allowed to refer to health and nutrition benefits.

For more information, please find attached our position papers on nutrition and TFA.

We would be delighted to have the opportunity to further discuss this with you at your earliest convenience.

Yours sincerely,

Ilaria Passarani
Head of the Health and Food Department