

**"X% LESS"
- WITH
NO CLAIM -
OR WHAT?**

**WE KNOW INDUSTRY
CAN DO BETTER!**

Food manufacturers argue that reducing calories and/or specific nutrients by 30% is difficult and that allowing them to advertise smaller reductions - as small as 15% - at least for a limited period of time (one year) would encourage them to reformulate their products. We do not believe so, rather the opposite: as it will be difficult to control that the claim "now X% less" is used for one year only, less scrupulous operators might be tempted to stop their efforts after a minor recipe change. We are also concerned that the claim "X% less" will mislead consumers.

BEUC supports food reformulation but we expect it to be driven first and foremost by public health reasons and not (just) used as a marketing tool. **Consumers do need the food industry to step up efforts on reformulation. They don't need an extra claim.**

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Nutrition claims are statements or other marketing techniques used by food companies to entice consumers to buy their products. They refer to the nutritional composition of a food product e.g. "low fat", "high in fibre", "reduced fat", etc.

While many of these claims can spur the food industry into making foods more healthy through meaningful reformulation, the same cannot be said for the proposed "now contains X% less" claim. Below we briefly outline the reasons why we object to this new nutrition claim.

CONSUMER INFORMATION OR MARKETING TOOL?

Claims influence consumers' perception of the "healthfulness" of foods, hence their purchase decisions and consumption patterns. A claim on nutrient reductions as low as 15% will not help consumers to make healthy food choices.

TOO MANY CLAIMS KILL CLAIMS!

Food manufacturers already use many nutrition claims to communicate about their products' nutritional composition. Comparing products to make healthy choices can already be a real challenge. The new "X% less" nutrition claim will only add to consumer confusion.

"REDUCED" vs. "NOW 15% LESS": WHICH ONE WOULD YOU PICK?

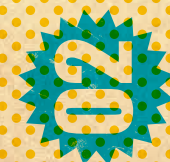
"Reduced" claims require at least a 30% (or 25% for salt) reduction but the label only mentions ("reduced [name of the nutrient]") - no figures. When faced with making a choice between products bearing these claims and products claiming "now 15% less" or "now 20% less", consumers may choose products bearing the latter as they could interpret the reduction to be bigger than for the "reduced" products!

A REWARD TO THE WORST PERFORMERS

Claims such as "reduced fat" or "light in sugars" compare a product's composition with that of other foods in a category. The claim "now X% less" compares a food...with its previous recipe. Consumers might be tempted to buy a product which they believe is healthier, whereas this is actually not the case!

X% LESS... BUT STILL A LOT!

Even after 15% reduction, many foods would still have a high fat, sugars and/or salt content. Small reductions are easy to achieve for manufacturers, and "now X% less" claims are likely to pop up all over the market, including on unhealthy foods.



CONSUMER INFORMATION OR MARKETING TOOL?

A 2005 survey commissioned by BEUC showed that claims influence consumers' perception of the "healthfulness" of foods, hence their purchase decisions and consumption patterns. It is important that claims are only permitted if they reflect a genuine and meaningful nutritional benefit. Authorising claims on nutrient reductions as low as 15% (vs. 30% today) would be a step backwards.



TOO MANY CLAIMS KILL CLAIMS!



"Reduced", "light in", "low"...some examples of the many nutrition claims EU food manufacturers can already use to communicate about their products' nutritional composition. For most consumers, who are not aware of what these claims exactly mean in terms of nutrients contents, comparing products to make healthy choices can be a real challenge. The new "X% less" nutrition claim will only add to their confusion.

A REWARD TO THE WORST PERFORMERS

SATURATED
FAT CONTENT
[PER 100G]
4g



CHOCOLATE SPREAD A*

SATURATED
FAT CONTENT
[PER 100G]
7.9g



CHOCOLATE SPREAD B*

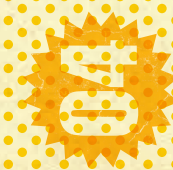
SATURATED
FAT CONTENT
[PER 100G]
10.9g



CHOCOLATE SPREAD C*

NOW 20% LESS
SATURATED FAT!
... BUT NEW CONTENT
AFTER REFORMULATION
(8.7g/100g) STILL
HIGHER THAN THAT OF
SIMILAR SPREADS!

"REDUCED" vs. "NOW 15% LESS": WHICH ONE WOULD YOU PICK?



Claims such as "reduced fat" or "light in sugars" compare a product's composition with that of other foods. This is in order to prevent the "reduced" claim from appearing on a product which has a higher salt, saturated fat or sugar content than other similar foods even after reformulation

has taken place. However, the claim "now X% less" compares a food...with its previous recipe. Consumers might be enticed to buy a product which they believe is healthier, whereas this is actually not the case!

* These are real products on the market.

X% LESS...BUT STILL A LOT!



Today, to make a "reduced" claim, EU law requires a reduction of at least 30% (25% for sodium/salt). But most consumers do not know that as the label just mentions "reduced [name of nutrient]". When faced with claims "now 15% less" or "now 20% less", they might wrongly interpret the reduction to be bigger than for the "reduced" claim where no figure is given!

Even after 15% reduction, many foods would still have a high content in fat, sugars and/or salt but as long as nutrient profiles have not been set, nothing would prevent products bearing such claims. Since small reductions are easy to achieve for manufacturers, "now X% less" claims are likely to pop up all over the market, including on unhealthy foods!



REDUCED
CALORIES

BISCUITS A



NOW 15%
LESS
CALORIES

BISCUITS B

