

Subject: Concerns over the delay of the revision of the Food Information to Consumers Regulation

Dear Commissioner Kyriakides,

I am writing to you on behalf of the European Consumer Organisation (BEUC) regarding the ongoing delay of the revision of the Food Information to Consumers Regulation (1169/2011). We strongly supported the indication from the European Commission in its 2020 Farm to Fork Strategy that it would revise the Food Information to Consumers Regulation to introduce new food information requirements for food businesses.

While this proposal was expected by the end of 2022, we have serious concerns that it will not see the light of day before the end of the current legislature. While we understand that the significant opposition from certain sectors in the food industry but also from certain Member States has hampered the Commission's original plans, failing to publish the proposal would mark a significant missed opportunity to improve information for European consumers.

It remains the case that over one in two European adults are now overweight or obese in most EU Member States while it is estimated that in the EU around a million early deaths are attributed to unhealthy diets each year¹. These are shocking statistics which are all the more concerning when we know that one in three children are also already affected.

Front-of-pack nutritional labelling cannot and should not be considered as a silver bullet to fix this issue, but better consumer information is indisputably a crucial tool in the toolkit of preventative health policies. As such, the World Health Organization includes it as one of its 'Best Buys' for the prevention and control of non-communicable diseases².

While we maintain that a mandatory and harmonised EU front-of-pack nutrition label is still the best option to provide helpful and punctual point-of-purchase information to consumers across Europe, we are now very concerned that the delay in the proposal is acting counterproductively. In our view, such a delay is preventing Member States who would like to go further and recommend a front-of-pack nutritional label to help their consumers but are awaiting a signal from the Commission.

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¹ Global, regional, and national incidence, prevalence, and years lived with disability for 354 diseases and injuries for 195 countries and territories, 1990–2017: a systematic analysis for the Global Burden of Disease Study 2017, The Lancet, November 2018.

² [Tackling NCDs: 'best buys' and other recommended interventions for the prevention and control of noncommunicable diseases](#), WHO 2017.

Indeed, before the Commission came forward with its commitment to propose an EU-wide label in May 2020, there was significant interest and momentum for the Nutri-Score label which, after being first proposed and endorsed in France in 2017 was rapidly recommended by six other European countries. Following the commitment from the Commission to introduce an EU-wide label understandably this momentum stalled.

This summer the German government, in the absence of the expected action at an EU-level, announced that it will introduce new mandatory origin labelling requirements for unpacked fresh meat. We believe that it is therefore important that the European Commission comes forward as soon as possible to clarify if there will be an EU-wide legislative proposal on consumer information. If, as it now looks likely, this will not be the case, and given the clear importance of nutritional information tools, we would call on the European Commission to ensure that Member States who wish to aid their consumers by endorsing front-of-pack nutritional labels are henceforth able to do so on a mandatory basis.

We thank you in advance for considering our comments and remain at your disposal for any questions you may have.

Yours Sincerely,

Monique Goyens
BEUC Director General