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## FEDIOL position on revised Nutriscore

FEDIOL, the EU vegetable oil and protein meal industry, has been following developments around Front-of-pack Nutrition Labelling systems over the past years. FEDIOL understands and supports the need to introduce a single harmonised system applicable throughout EU countries, which will facilitate consumer choice towards healthier dietary options.

Among the existing schemes applicable in some EU countries, the Nutriscore is a type of summary label – graded indicators. As defined in the Commission Roadmap on Food labelling<sup>1</sup> – revision of rules on information provided to consumers, such types of systems aim at *“providing a synthetic appreciation of a product's overall nutritional value through a 'graded indicator' that provides graded information on the nutritional quality of foods that is applied on all food products”*.

FEDIOL has been following the developments of the Nutriscore very closely, and particularly since its uptake outside the French territory. Back in 2019, FEDIOL assessed the Nutriscore<sup>2</sup> and what it meant for bottled vegetable oils and fats. According to the system, prior to the recent July 2022 revision, the scoring of vegetable oils and fats occurred between “C” and “E”. This was not in line with existing national dietary guidelines nor with EU approved health and nutrition claims. There was a clear contradiction between on the one hand the benefits of some vegetable oils and fats, high in PUFA or in omega 3, which are recommended to be favoured over other oils and fats and on the other hand, the fact that such vegetable oils and fats were getting a “C” score and hence were supposed to be eaten “less frequently”.

As the Nutriscore evolved into a transnational body and offered the possibility to comment, FEDIOL worked on a detailed dossier<sup>3</sup>, which was submitted to the Nutriscore Steering Committee in June 2021.

FEDIOL has read in detail the revised report<sup>4</sup> of the Nutriscore algorithm prepared by the Nutriscore scientific committee, as released in July 2022. FEDIOL welcomes the

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<sup>1</sup> European Commission Inception Impact Assessment, Proposal for a revision of Regulation (EU) No 1169/2011 on the provision of food information to consumers, Ref. Ares (2020)7905364 - 23/12/2020.

<sup>2</sup> FEDIOL position on Nutriscore, 19NUT079, 9 April 2019. [https://www.fediol.eu/data/19NUT079\\_FEDIOL\\_position\\_on\\_Nutriscore\\_-\\_9\\_April\\_2019.pdf](https://www.fediol.eu/data/19NUT079_FEDIOL_position_on_Nutriscore_-_9_April_2019.pdf)

<sup>3</sup> FEDIOL dossier available publicly on the website of the Belgian Public Health, security of the food chain and environment <https://www.health.belgium.be/en/fediol-position-towards-adapted-nutriscore-bottled-vegetable-oils-and-fats>; <https://www.health.belgium.be/en/annex-2-fediol-request-adjustments-nutriscore-bottled-vegetable-oils-and-fats>; <https://www.health.belgium.be/en/annex-3-fediol-request-adjustments-nutriscore-bottled-vegetable-oils-and-fats>.

<sup>4</sup> Update of the Nutriscore algorithm, Update report from the Scientific Committee of the Nutriscore 2022, July 2022.

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modifications made to the “fats, oils, nuts and seeds” category. FEDIOL considers that this is a **clear improvement and a step into the right direction**. Indeed, it enables to range vegetable oils and fats between “B” and “E” and modifies the score of some vegetable oils and fats considering their “lower” content in saturated fat. However, it did not directly consider the benefits of those vegetable oils and fats high in PUFA or in Omega 3 like linseed oil or camelina oil, which are still marked as “C”<sup>5</sup> and which would also merit getting a “B” as per their fatty acid profile compared to other vegetable oils and fats getting a “B”.

FEDIOL understands also that **vegetable oils from the ingredients previously qualifying for the positive component of “fruit, vegetables, legumes” have been removed from such a category, and hence that the benefit from an improved scoring resulting from the use of these lower saturated fat oils in the final food product has been deleted. FEDIOL fails to understand the rationale behind this, which is not based on any scientific considerations**. It will surely not support Food Business Operators (FBOs) to reformulate their final products to get a better fatty acid profile and will not promote those “healthier” vegetable oils and fats. Why would a FBO use a “healthier” vegetable oil or fat vs. another, if there is no clear incentive to do so? FEDIOL believes that those vegetable oils and fats getting a “B” or a “C” should be considered in the positive points for a final food product to improve its score. This would enable to count in all types of vegetable oils and fats as per their regional consumption, and not only those included in the French PNNS, which was the reason mentioned in the report to allegedly justify the deletion of such a positive component.

Furthermore, considering the upcoming EU legislative proposal expected for release in the coming months and where it could be that the same system would be applied both for front of pack nutrition labelling and for nutrient profiles, **FEDIOL has reservation on the application of the Nutriscore as such for vegetable oils and fats – depending on where the threshold for Nutrient Profiles would be set**. Indeed, it would not be acceptable for FEDIOL that only “B” vegetable oils and fats would be allowed to bear a health or nutrition claim. It would deprive in practice many bottled vegetable oils and fats in the “C” category to bear their EU authorised and EFSA assessed nutrition and health claims. FEDIOL could envisage such a system, if it was also encompassing vegetable oils and fats in the “C” category.

FEDIOL remains available to engage and provide insights from its sector in the upcoming EU legislative proposal on the FIC revision.

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<sup>5</sup> According to the nutritional information used by the Scientific Committee of the Nutri-Score for the updated July 2022 report. Ibidem footnote 4.