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FEDIOL position on Nutriscore

Context

FEDIOL has been engaged in discussions and has followed the developments on nutrient profiles for many years. FEDIOL participated in the study and subsequent consultations, which the European Commission initiated in 2016. The European Commission is now working on its own report, which is expected to be published in 2019.

FEDIOL has noticed the multiplication of various national initiatives setting nutrient profiles as a primary or secondary objective, none of which are for the specific purpose of evaluating food to determine whether they could carry nutrition and health claims. One of these initiatives is the French Nutriscore system. Such system, which is voluntary, introduces a numerical evaluation scheme and subsequent labelling of food products with respect to their content in specific nutrients. The Nutriscore system attributes positive and negative points to nutrients based on their perceived nutritional status. The same calculation parameters apply across all food products, with the exception of cheese, vegetable and animal fats and drinks, for which there are specific adaptations.

For food labelling purposes, the numerical values calculated for a particular food determine the letter and colour coding for a defined range of nutrients. The Nutriscore letter coding ranges from A (best) to E (worst), and each letter is associated with one of 5 colours ranging from dark green (best) to dark orange (worst).

Given the uptake of the Nutriscore system in France and outside, FEDIOL would like to raise the following points regarding vegetable oils and fats, and particularly bottled oils sold to consumers.

Nutriscore criteria for vegetable oils and fats and what it means in practice

FEDIOL strongly believes that any criteria for nutrient profiles should be based on available science and should be achievable, even if challenging, through reformulation. FEDIOL has therefore assessed the Nutriscore system to understand where bottled oils would fall in practice.

The [Nutriscore system](#) sets the below criteria for *added fats and oils*, which includes both vegetable and animal oils/fats.

Whilst the category of "*added fats and oils*" (*matières grasses ajoutées*) sets a specific ratio saturated fats vs. total fat, which is only applicable to this category, the same criteria as set for all other types of food products are maintained.

Whilst FEDIOL welcomes the introduction of such specific criteria for all added oils and fats, and hence also vegetable oils and fats, it does not enable to re-balance the other negative N components.

As further detailed in Annex I, **the assessment for all added vegetable oils and fats will only vary depending on the unique characterisation under the ratio SAFA/total fat content. They will hence fall in categories C (light orange), D (orange) or E (dark orange), but never in the green categories A or B.**

Under the current Nutriscore assessment, the vegetable oils and fats scorings are as follows:

Type of vegetable oil/fat	Nutriscore scoring ¹
Rapeseed oil	C
Walnut oil	C
Hazelnut oil	C
Mix of vegetable oils	C or D
Sunflower oil	D
Soybean oil	D
Virgin/extra virgin olive oil/olive oil	D
Peanut oil	D
Maize oil	D
Avocado oil	D
Grapeseed oil	D
Palm oil	D
Coconut oil	E
Ghee	E
Butter	E

This leads to:

- 1) Difficulties in differentiating across the product category of “vegetable oils and fats”, given the fact that the overall majority of vegetable oils and fats fall into the category D. This will lead to difficulties in appreciating the actual nutritional differences of products across the category and making it difficult for consumers to make healthy food choices.
- 2) Consumers’ (mis)understanding that all vegetable oils and fats are “bad”, as ranging from C to E, and none in the green categories.
- 3) Consumers’ (mis)understanding that even the “healthiest” bottled oils like rapeseed oil or olive oil are actually “unhealthy” as categorised as orange or dark orange.
- 4) Discrepancies with WHO or national health recommendations, whereby implementing the Nutriscore will lead to contradicting/not following the WHO and/or national health recommendations.
 - WHO ² recommends replacing butter, lard and ghee with oils rich in polyunsaturated fats, such as soybean, canola (rapeseed), corn, safflower and sunflower oils to lower the risk of developing non-communicable diseases. As the Nutriscore does not enable to differentiate between vegetable oils, consumers will not be encouraged to favour oils rich in polyunsaturated fats over other oils and fats.

¹ As cross-checked on 9 April 2019 on Delhaize webshop (except for soybean oil, palm oil and ghee for which the category was derived from direct calculations of the Nutriscore criteria).

² WHO factsheet on healthy diet, updated October 2018. <https://www.who.int/news-room/factsheets/detail/healthy-diet>

- It further contradicts what WHO considers as core/basic products³ whereby vegetable oils and fats are *recommended to be consumed as part of a healthy diet in most national nutrition guidelines*.
 - In France, [national French health recommendations](#)⁴ recommend to favour olive, rapeseed and walnut oils, however, they score as “C” or “D” (see above) and are hence supposed to be consumed “less frequently”. This is a clear contradiction between the national health recommendation and the implications of the Nutriscore to such oils.
 - In the Netherlands, the official health recommendations of the Health Council of the Netherlands, reflected in the [Dutch wheel of five](#) recommends replacing butter, hard margarines and the fats used in baking and frying with soft margarines, liquid baking and frying fats, and oils. Soft margarines, liquid baking and frying fats and oils are part of the Wheel of Five and should therefore be eaten ‘enough every day’. Implementing the Nutriscore would mean that recommended products would still get a C or D, hence supposed to be consumed “less frequently”.
 - The difficult comparison of vegetable oils and fats over their category does not support the [Italian guidelines for a healthy diet](#), which explicitly recognizes that, whilst all fats are equal in terms of energy intake, they can be very different on their quality, as their chemical composition varies, and in particular as regards the fatty acids composition (which can be saturated or unsaturated). The Italian guidelines further recognizes that the different quality of fats can have important effects on the state of nutrition and of human health.
 - It will not further stimulate the consumption of oils and fats rich in PUFA and omega 3, as per the [Belgian nutritional recommendations](#).
- 5) This is also not in line with recent publication⁵, which recommends to favour unsaturated oils, defined as 20% each of olive, soybean, rapeseed, sunflower and peanut oils. The scoring of the Nutriscore leads to the conclusion that unsaturated oils should be less consumed.
- 6) It further contradicts EU health and/or nutrition claims made on some vegetable oils such as “essential fatty acids are needed for normal growth and development of children” and “high in unsaturated fats” – highlighting their health/nutrition benefits – vs. their “C” or “D” scoring pinpointing that they should be consumed “less frequently”.
- 7) Last but not least, it further denies the proven benefits of polyunsaturated fats in a healthy diet, whilst vegetable oils and fats are a major contributor in several countries⁶.

In addition, the Nutriscore system introduces further discrepancies depending on whether the calculation is made per 100 g or per 100 ml. According to the [Nutriscore](#)

³ Kelly B, Jewell J. What is the evidence on the policy specifications, development processes and effectiveness of existing front-of-pack food labelling policies in the WHO European Region? Copenhagen: WHO Regional Office for Europe; 2018 (Health Evidence Network (HEN) synthesis report 61).

⁴ Les matières grasses ajoutées – huile, beurre et margarine – peuvent être consommées tous les jours en petites quantités. Privilégiez l’huile de colza, de noix et d’olive. Recommandations relatives à l’alimentation, à l’activité physique et à la sédentarité pour les adultes. Saint-Maurice : Santé publique France, 2019. 62 p.

⁵ Willett W, Rockström J, Loken B, Springmann M, Lang T, Vermeulen S, Garnett T, Fan S *et al.* 2019. Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems. *The Lancet* 393(10170): 447-492. [https://doi.org/10.1016/S0140-6736\(18\)31788-4](https://doi.org/10.1016/S0140-6736(18)31788-4)

⁶ Sioen I, van Lieshout L, Eilander A, Fleith M, Lohner S, Szommer A, Petisca C, Eussen S, Forsyth S, Calder PC, Campoy C, Mensink RP. 2017. *Ann Nutr Metab.* 2017;70(1):39-50. doi: 10.1159/000456723. Epub 2017 Feb 11. Review.

[FAQ](#), with liquid foods such as soups, oils or milk, the value used is the one given as a unit on the nutrition label, and not a unit that is not written on the packaging (to ensure transparency for the consumer). If two values are mentioned (per 100g and per 100 ml), the one per 100 g is to be taken into account. Following that consideration, a sunflower oil could fall under the criteria D, if calculated per 100 g vs. criteria C, if calculated per 100ml.

FEDIOL therefore considers that the current calculation system does not enable a proper comparison of vegetable oils and fats within the entire category and across the sub-categories defined by the current scoring. Hence it does not help consumers in making healthier food choices.

FEDIOL is currently looking at how such comparison could be enhanced, based on scientifically valid criteria and therefore stands ready to further discuss this topic with competent authorities.



Annex 1: Nutriscore – category of “Added fats and oils”						
Fruits and vegg	Fibres	Proteins	Energy	SAFA (ratio SAFA/total fat content)	Sugar	Salt
0 positive point for bottled vegetable oils and fats	0 positive point for bottled vegetable oils and fats	0 positive points for bottled vegetable oils and fats	>3,350 kJ =10 negative points	<10: 0 negative point <16: 1 negative point <22: 2 negative points <28: 3 negative point <34: 4 negative points <40: 5 negative points <46: 6 negative points <52: 7 negative points <58: 8 negative points <64: 9 negative points ≥64: 10 negative points	0 negative point for bottled vegetable oils and fats	0 negative point for bottled vegetable oils and fats
Bottled vegetable oils and fats do not contain fruits and vegetable. Hence all will have the same zero score.	Bottled vegetable oils and fats do not contain fibres. Hence all will have the same zero score.	Bottled vegetable oils and fats do not contain proteins. Hence all will have the same zero score.	Bottled vegetable oils and fats all contain the same amount of energy of 3,700 kJ or 900 kcal per 100 g. Hence, all will get 10 negative points.	Differentiation between bottled vegetable oils and fats are only possible here. But this is not enough to enable a fuller comparison within the vegetable oil and fat category.	Bottled vegetable oils and fats do not contain sugar. Hence all will have the same zero score.	Bottled vegetable oils and fats do not contain salt. Hence all will have the same zero score.
All bottled vegetable oils and fats assessment will only vary depending on the unique characterisation under the ratio SAFA/total fat content. They will hence fall in categories ranging from C (light orange), D (orange) or E (dark orange).						