

12/06/2020

# Opinion Piece by Roberto Moncalvo

## Nutrition labelling: informing without misleading

Within its Farm to Fork Strategy, the Commission presented a series of measures directed at helping consumers make healthier food choices and at promoting more sustainable food consumption patterns. As consumers themselves, farmers are supporters of policies that could contribute to improving consumers eating habits and their health. However, reading the proposals regarding nutrition information contained in the recently published Farm to Fork Strategy, we became concerned that not only the Commission would not succeed in achieving those commendable objectives, but that they would also severely undercut an already fragile EU farming community and compromise its years of efforts to promote its high standards around the world. Let me explain my thinking in the following lines.

**A front-of-pack nutrition labelling should empower consumers not deprive them from quality and highly nutritionally valuable food products.**

In its Farm to Fork Strategy, the Commission states that they will propose a harmonised mandatory front-of-pack nutrition labelling, also referred to as the FOPNL system, by 2020 to *“enable consumers to make health conscious food choices”*. Furthermore, in its report *“regarding the use of additional forms of expression and presentation of the nutrition declaration”* published on the same day, the Commission seems to give its favor towards the use of a colour-coded system of FOPNL.

As farmers and also as consumers, we welcome the opportunity to support a measure improving consumers' health and we believe that the high nutritional quality of the food we take pride in producing can contribute to it. However, we fear that a colour-coded nutrition labelling system would end up presenting an over-simplistic classification of food products between those that are “good”, in green, and those that are “bad”, in red. Such a dichotomy will stigmatise highly nutritious products which are praised for their nutritional value by nutritionists all over the world, such as olive oil. Furthermore, this type of system also discriminates against many products with Geographical Indications that are the result of a cultural and traditional heritage. Such a system would be catastrophic for those products as the only solution for them not to be discriminated against and for them to benefit from a better “colour” would be reformulation. However, in order to benefit from Geographical Indications or other quality schemes, those products have to respect very strict criteria. This means that any reformulation of those products would be very complicated or simply impossible. Products benefiting from GIs and other EU quality schemes represent an economical value of more than 77,15 billion euros per year, and 7% of the total sales value of EU food and drink products. This does not even take into account national and regional quality schemes. Therefore, a colour-coded system could seriously endanger a significant part of many small producers' income. Moreover, the EU and its farmers did not spearhead their efforts over the years to promote those products for which we are renowned around the world. Would it make sense to favour a system

that would ruin those efforts and the products that are at the heart of traditional diets revered for their health benefits such as the Mediterranean one?

We also believe that if the objective is to “*enable consumers to make health conscious food choices*”, the FOPNL system chosen should be science based and designed by an independent and scientific organisation such as EFSA, following dietary guidelines established in the same way. If we start to base nutritional information and the dietary guidelines supporting it solely on plant-based diets or environmental sustainability concerns without taking health into account, we might be putting people’s health at risk.

The colour-coded FOPNL system that the Commission seems to favour does not take into account the complexity of food products when establishing their nutritional contribution. Indeed, each food and drink product contains different macronutrients and micronutrients. When establishing nutritional labelling, a complete evaluation of the food should be carried out, without being based exclusively on certain nutrients. By focusing solely on a very limited number of nutrients (e.g. sugar, fat and salt) and the energy intake, we end up setting aside nutritiously valuable food products. Do we really want to end up with people disregarding honey, but feeling good about consuming aspartame based diet soft drinks?

We agree that any FOPNL system in the EU should be harmonised at EU level to avoid any market disturbances and consumer confusion or mistrust, but we believe that any FOPNL should be voluntary. Moreover, farmers’ products are crafted and they may vary slightly from one batch to another and over seasons, especially those containing natural ingredients like dairy products, meat or fish, making it difficult to apply the same FOP label to all the products within that category. Only industrial processed products will have the same exact nutrient content every time. Do we really want to penalise, with a mandatory FOPNL, those small actors who are in any case not those producing the highly processed and unhealthy products, but rather the ones offering consumers the best of the EU terroirs?

**Establishing nutrient profiles to restrict the promotion of products high in sugar, salt or fat, should not mean opening the door to a boycott of high quality traditional food products.**

In parallel to a colour-coded FOPNL, the Farm to Fork Strategy also intends to establish nutrient profiles to restrict the promotion of products high in fat, sugar, and salt in accordance with the EU Regulation on nutrition and health claims on food (Regulation (EC) No 1924/2006). If we perfectly understand the Commission’s will to protect consumers’ health by trying to reduce their intake of fat, sugar and salt, we are afraid that the Commission does not realise the far reaching consequences that this initiative might have on the survival of many small producers of traditional agricultural products.

In practical terms, this initiative intends to establish maximum limits for sugar, salt, and fat in relation to the other nutrients found in a product. If a food product goes over those limits, they would not be allowed to bear health claims. So, for example, a snack bar for which the level of sugar is above a specific threshold could not use health claims on its packaging like “This product is rich in fibers”. When we talk about highly processed industrial products, especially those targeting children, we can understand the will to

restrict their promotion, however, when it comes to high quality traditional products such as cheese or olive oil, the Commission should realise that it will have the same destructive effect that a colour-coded FOPNL would.

It will restrict the promotion of highly nutritionally valuable products such as honey, vegetable oils or salmon, while allowing nutritionally pointless products such as diet coke or highly processed kids' sorbets full of chemicals to be advertised. It will also dramatically affect products benefiting from Geographical Indications and it could even open the door to further restriction measures from Member States (like additional taxes) for those high-quality products that do not match the right salt, sugar and fat contents. We have to remind ourselves that the rationale behind nutrient profiles is to limit the intake of junk-food and improve the nutritional value of highly processed products, not make a clean sweep of our rich culinary history and tradition, and deprive consumers from very nutritionally valuable agricultural products. We believe that nutrient profiles should not be applied to food products produced directly by farming community.

### **Promoting sustainable consumption and production should encompass all the aspects of sustainability**

Another initiative of the Farm to Fork is to review the EU promotion policy and create a sustainable food labelling framework to enhance sustainable production and "to empower consumers to make sustainable food choices". We are glad to hear that, as farmers are the first ones to benefit from fighting climate change and ensuring that food production is a sustainable activity. However, in the latest version of the communication that was leaked before the official one, it stated that the Commission would stop the promotion of meat and it could favour some consumption tax mechanisms paving the way to a meat tax. We truly hope that it is not what the Commission has in mind when it proposes to promote more sustainable food production and consumption.

Sustainability encompasses three different aspects: environmental sustainability, social sustainability, and economical sustainability. If the Commission was to stop the promotion of meat production and encourage the possibility for Member States to impose additional taxes on meat, none of those three elements would be fulfilled. We should not forget that animal products account for more than 50% of EU farmers income. So there goes our social and economic sustainability. How could farmers sustain themselves and their employees if we strip them from an essential part of their revenue? Farmers' incomes are already on average extremely low. In Belgium, more than 70% of them had monthly incomes inferior to 1500 euros, and 30% under 1000 euros. It is already a very hard job, do we really want to make it impossible?

Putting a stop to the promotion of meat production and consumption as well as a possible meat tax would render any social and economic sustainability impossible, but it would also not help environmental sustainability and animal welfare. If we have a short-sighted understanding of those initiatives, we could indeed believe that by reducing meat production and consumption in the EU we would help the environment and the production of animal proteins being more environmentally costly than plant proteins. However, if we look further we realise that it would be counterproductive. Consumers will not suddenly stop consuming meat, they will just look for it where it is, outside the EU. This means that those policies would encourage the consumption, and thus the

production, of non-EU meat which is produced with considerably lower sustainability and animal welfare requirements than EU meat. In the end, world production would not be lowered, it would just be less sustainable.

The Commission should not put the cart before the horse, and should first assess the impact that those measures would have on its consumers, its farmers, and the environment. We, European farmers and agricultural cooperatives, are really looking forward to helping improve consumers' health and the sustainability of our food system, we just want to ensure that the measures taken will truly have the expected results.

**Roberto Moncalvo, Italian Fruit and Vegetable producer, Former National President of Coldiretti, currently President of Coldiretti Piedmont Region and Copa's Vice President**

**-ENDS -**

Translations will be available in DE, ES,FR, PL on Copa-Cogeca website soon.

Download [HERE](#) Roberto Moncalvo HD picture.



**About the author:** Roberto Moncalvo is the owner of a farm located in the Piedmont region which he runs together with his wife and his sister. Specialized in the production of fruits and vegetables, the farm has invested in infrastructure for on-farm food processing, agri-tourism and direct sales. The farm is socially engaged in the local community: they are officially recognized as on“educational farm” and involved in social farming activities, like the employment of refugees and people with disabilities. The latter activity has been enhanced through the creation in 2011 of an agricultural cooperative named “Aware Farmers”.

Roberto Moncalvo was unanimously elected in 2013 President of Coldiretti (2013-2018), and since 2015 he is the first Vice President of COPA.

---

For further information, please contact:

**Bruno Menne**

Policy Advisor

[Bruno.Menne@copa-cogeca.eu](mailto:Bruno.Menne@copa-cogeca.eu)

**Jean-Baptiste Boucher**

Communications Director

Mobile: + 32 474 840 836

[jean-baptiste.boucher@copa-cogeca.eu](mailto:jean-baptiste.boucher@copa-cogeca.eu)

---

**CDP(20)4222:1**

---