

## AREPO POSITION ON THE EC ROADMAP ON THE REVISION OF RULES ON INFORMATION PROVIDED TO CONSUMERS

In the framework of the Farm to Fork strategy, the European Commission has announced several actions aiming to facilitate the shift towards healthier and more sustainable diets. Particularly, in order to empower consumers to make healthy food choices by understanding labelling information, **the EC intends to establish a harmonised mandatory front-of-pack nutrition labelling (FOPNL)** as well as **to set nutrient profiles**, at the base of FOPNL, with the objective of preventing the use of nutrition or health claims on foods high in fats, sugars and salt, which might mislead consumers on the overall nutritional status of a product.

AREPO agrees with the European Commission that one of the biggest challenges ahead is to be able to consume and eat within planetary limits and preserving health. We do believe that a shift towards more sustainable and healthier behaviours is needed. Nevertheless, **AREPO fears that the combination of the abovementioned actions could harm EU products covered by EU Quality Schemes**, limiting the impact of the ongoing efforts to fully unfold their potential<sup>1</sup>.

It cannot be forgotten that EU Geographical Indications (GIs) are often **associated with the production of public goods**, considered in terms of sustainable rural development, growth and employment, diversification of rural economy, protection of natural resources and landscape, welfare of farm animals, food security, food safety and traceability.<sup>2</sup> As a result, besides being the expression of EU culture and identity and representing 15.5% of the total EU agri-food exports<sup>3</sup>, **they contribute in several ways to sustainability** (social, economic, environmental) **and to sustainable food system<sup>4</sup>, representing pivotal instruments to meet the objectives at the heart of the Farm to Fork strategy.**

Additionally, they are a guarantee of safe, traceable and high-quality product, their production strictly complying with the conditions and standards detailed in the product specification.

All this considered, AREPO would like to recommend to the European Commission to firstly address its efforts towards **more education and better communication on the importance of a diversified and balanced diet and how EU Geographical Indications and quality products can contribute to it.**

### 1. FOPNL: THE RISK FOR EU GIS OF AN OVERSIMPLIFIED NUTRITION INFORMATION

Focusing on the objective of establishing a harmonised mandatory front-of-pack nutrition labelling AREPO welcomes the commitment of the Commission to analyse different policy options in order to assess which one is the best<sup>5</sup>.

In fact, **AREPO believes that it would be highly risky to concentrate only on the Option 4 of the Inception Impact Assessment, i.e. a FOPNL using colour-coding combined with a graded indicator, such as the Nutriscore. AREPO firmly thinks that this option will not be fit for purpose, due to the oversimplification of information provided.** We question that this type of FOPNL will provide clear and accurate information to consumers, especially with regards to GIs.

In details, AREPO would like to stress that:

<sup>1</sup> [Food & drink – EU geographical indications scheme \(revision\)](#)

<sup>2</sup> [AREPO Position Paper on European Commission Evaluation of Geographical Indications and Traditional Specialities Guaranteed Protected in the EU](#), January 2020

<sup>3</sup> Study on economic value of EU quality schemes, geographical indications (GIs) and traditional specialities guaranteed (TSGs), 2020. AND-International, Directorate-General for Agriculture and Rural Development (European Commission), ECORYS

<sup>4</sup> [Strengthening sustainable food systems through geographical indications: An analysis of economic impacts](#), FAO, Rome, 2018

<sup>5</sup> [Inception Impact Assessment, Proposal for a revision of Regulation \(EU\) No 1169/2011 on the provision of food information to consumers](#)

- Any colour-coded system with a graded indicator **oversimplifies the nutrition information of a product.**

Fruit and vegetables excluded, Geographical Indications and some single ingredient products (charcuterie, cheese, olive oil) praised for their nutritional value as part of a balanced diet, **may be disadvantaged by an oversimplified nutrition presentation.**

- The Nutriscore does not take into account **dietary intake**, nor the **daily balanced diet**, nor the notion of **pleasure food.**

As a matter of fact, this system assigns points **based on the nutritional composition per 100 g or 100 ml of the product.** As a result, certain foodstuffs, e.g. festive products, will be rated as bad **not considering the low frequency and low quantity of consumption.**

Plus, as stressed in the EC report on FOPNL initiatives<sup>6</sup>, the visual bias of **perceiving certain food as healthy**, might lead to **underestimating quantity and energy content**, indulging in excessive intake of food or large portion sizes.

- The Nutriscore does not take into account the **level of processing of a product.**

This means that, in the Nutriscore evaluation, some ultra-processed and industrial food might perform better than traditional and very little processed products, like GIs, whose production responds to very strict conditions and standards described in the **product specification.**

- Due to their composition and traditional characteristics detailed in the product specification, **reformulation is seldom possible for GIs.** Their nutrient profiles and production techniques cannot be altered **without changing the very nature of the product.**

For that very reason, AREPO warns as well on the possible impact on GIs of Action 15 and 16 of the Farm to Fork Action Plan:

- The intention of the Commission **to stimulate product reformulation** (Action 15) and **to set up nutrient profiles** to restrict the promotion (via nutrition or health claims) of foods high in fat, sugars and salt (Action 16) could represent **a serious threat for GIs if they are not considered as an exception to this process.** These actions should be limited to industrial products.

## 2. NUTRITION EDUCATION TOWARDS A DIVERSIFIED AND BALANCED DIET

Hereby, **AREPO would like to reiterate its support for Commission intention to empower EU citizens and consumers to adopt more sustainable and healthier behaviours.**

For all the reasons previously expressed, we encourage the Commission to analyse the impact of several policy options, without focusing *a priori* on a FOPNL using colour-coding combined with a graded indicator, like the Nutriscore.

Nevertheless, in the light of previous considerations, **our priority is to stress that FOPNL cannot alone engender such an ambitious long-term change.**

As a matter of fact, fighting off unbalanced nutrition, recognised as cause of several lethal diseases, **requires nutrition education** in order to increase consumers understanding and use of information eventually provided with nutrition labelling.

Consequently, AREPO would like to recommend to the European Commission to address its efforts **towards more education and better communication on the importance of a diversified and balanced diet** and how EU Geographical Indications and quality products can contribute to it.

<sup>6</sup> European Commission, [Report regarding the use of additional forms of expression and presentation of the nutrition declaration](#), COM(2020) 207 final

The main message should be focused on the idea of “*eating less but better*”, reintroducing the notion of **portion** and **daily intake**, combined with the adoption of a **more active lifestyle to reverse the consequences of sedentariness**.

Plus, emphasis should be placed on the priority of **dietary diversity**, encompassing different categories of food, tastes, seasonality, freshness, culture and skills.

EU PDOs and PGIs fit in this context. It is worth noting **that many GIs are associated with specific diets recognized for their interest in terms of nutrition**, as proved by the renowned example of the Mediterranean diet. The traditional ways of cultivating plants and raising animals, the influence of natural conditions, the human practices as well as the traditional methods of processing and conservation, are crucial in the nutritional quality of GI products. Thus, **GIs have great potential in playing a significant role in the shift to healthier diets**, through their own qualities, including nutritional and organoleptic ones, and influence on consumer behaviours.<sup>7</sup>

Should the European Commission go ahead with the proposal to introduce a mandatory FOPNL at EU level, applicable to EU GIs too, **AREPO calls upon the Commission to establish alternative ways of communicating the high quality of these products to consumers**, eventually considering how to engage producers and consortia in this process.

As a result, AREPO would like to suggest to the European Commission:

- **To keep allocating a sizeable budget to Promotion of EU Quality Schemes.** A strong promotion strategy will be key to feed consumers’ understanding of the beneficial characteristics of GI products;
- **To increase scientific research on GI and nutrition profile, encouraging the publication of data and results.** The availability of data will make easier to share them among researchers, international and national organizations, policy makers as well as increase producers’ awareness on the nutritional quality of their products and their impact on health.
- **To better involve producers, encouraging them to provide comprehensive information on their products** and how they are linked to the origin.

The [Association of European Regions for Products of Origin \(AREPO\)](#) brings together 33 European regions and more than 700 associations of producers for over 50% of European GIs. AREPO aims to promote and defend the interests of producers and consumers in European regions committed to promoting quality agri-food products.

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<sup>7</sup> FAO-oriGIn Forum on Contributing to SDGs through quality linked to geographical origin, [“Contribution of geographical indications to sustainable healthy diets”, Background paper](#)