

# Nutrient profiles

## A 'farm to fork' strategy initiative takes shape

### SUMMARY

The European Commission is planning to establish 'nutrient profiles', that is, maximum amounts for nutrients such as fat, sugar and/or salt in foods, above which the use of nutrition or health claims would be restricted or forbidden. For example, breakfast cereals exceeding a sugar limit could no longer advertise their fibre or vitamin content.

The Commission was already tasked with setting nutrient profiles to restrict the promotion of food high in fat, sugar and/or salt under the Nutrition and Health Claims Regulation ('Claims Regulation') adopted in 2006. Now, in accordance with the action plan accompanying the EU's 'farm to fork' strategy, the Commission will submit a proposal on nutrient profiles by the end of 2022. The proposal will form part of a wider package revising EU legislation on food information supplied to consumers, together with proposals on front-of-pack nutrition labelling, origin labelling, date marking, and labelling of alcoholic beverages.

In the same package, the Commission also intends to solve a problem that has long been puzzling manufacturers and consumers in the herbal and plant products market, namely, that the same product can be classified both as a herbal medicine and as a food, depending on the Member State in which it is sold.

While most consumer organisations and health advocates strongly support the idea of introducing nutrient profiles, opponents caution against overly simplistic labels that punish certain food groups and lead health-conscious individuals to avoid them. The European Parliament has stressed that food information is a potent tool for empowering consumers.



### IN THIS BRIEFING

- Introduction
- Commission report on nutrient profiles
- Where we stand
- European Parliament
- Stakeholder views
- Outlook

## Introduction

Europeans' diets are not in line with [dietary recommendations](#) for healthy eating: almost 60 % of adults in the EU are estimated to be [overweight or obese](#); according to a January 2022 [Eurostat survey](#), 33 % of Europeans do not eat any fruit or vegetables daily, and only 12 % consumes the recommended five portions per day. The issue has gained even more attention during the pandemic, as people living with [non-communicable diseases](#) (NCDs) face a [greater risk](#) of becoming severely ill from Covid-19. Unhealthy diets and excessive intake of sugar, fat and salt are closely linked to NCDs such as high blood pressure, diabetes, obesity and cancer.

With the aim of promoting healthier diets, the European Commission committed in its May 2020 '[farm to fork strategy](#)' to submit, by the end of 2022, a [set of proposals](#) revising EU rules on information provided to consumers; this initiative is also in line with its February 2021 [Europe's Beating Cancer plan](#). By improving consumer information, the Commission hopes to empower people to make informed and healthy choices. The Commission's plans include harmonised mandatory front-of-pack [nutrition labelling](#) for food products, mandatory labelling of the list of ingredients on [alcoholic beverages](#), and [establishing nutrient profiles](#) to restrict the promotion of food high in salt, sugar and/or fat.

## Commission report on nutrient profiles

Together with its May 2020 communication on the farm to fork strategy, the Commission published a [staff working document](#) on the evaluation of [Regulation \(EC\) No 1924/2006](#) – the Nutrition and Health Claims Regulation ('Claims Regulation') – with regard to nutrient profiles and health claims made on plants and their preparations, along with an [executive summary](#) of the evaluation.

The Commission recalled that the Claims Regulation was adopted in 2006 to protect consumers, aiming to ensure that all health and nutrition claims made on foods sold in the EU are accurate and based on scientific evidence. According to the regulation, the Commission was also to establish, by 19 January 2009, nutrient profiles for foods or certain categories of foods. Nutrient profiles are maximum amounts for nutrients such as fat, sugar and salt, above which nutrition and health claims would be restricted or prohibited. The objective is to avoid situations in which these claims would mask a product's overall nutritional status, misleading consumers when trying to make healthy choices. 'Nutrition claims' are statements such as 'fat-free' and 'high-fibre', while 'health claims' make the link between food and health, for instance by stating that 'vitamin D is needed for the normal growth and development of bone in children'.

The Commission notes that, 'given the high controversy of the topic and strong opposition by some Member States', nutrient profiles have still not been established at EU level, despite consumer organisations strongly advocating them. Nevertheless, the Commission concludes in its staff working document that the specific objective pursued by nutrient profiles – to prevent a positive health message on foods with high fat, sugar and/or salt content – is still relevant, as in the absence of nutrient profiles, consumers continue to be exposed to these kinds of claims.

Setting nutrient profiles is a complex task. As stated in the Claims Regulation, the establishment of nutrient profiles should take into account not only the content of different nutrients and substances with a nutritional or physiological effect, such as fat, saturated fat, trans-fatty acids, salt/sodium and sugar, but also the presence of vitamins, minerals, protein and fibre. When setting nutrient profiles, different categories of foods, and the place and role of these foods in the overall diet, should be considered, and due regard should be given to the various dietary habits and consumption patterns present in the Member States. Furthermore, the regulation notes that 'exemptions from the requirement to respect established nutrient profiles' may be necessary for certain foods, depending on their role and importance in the diet of the population.

The Commission staff working document also explores another, related problem in consumer information: health claims made on plants in food. The Claims Regulation stipulates that health

claims made on foods, including on plants, should only be authorised after a scientific assessment by the European Food Safety Authority (EFSA). In 2009, no health claim on plant substances used in foods received a favourable assessment from EFSA, mainly because of the [absence of studies](#) on the relationship between the consumption of the food and the claimed effect. This led to a suspension of the authorisation procedure in 2010.

In 2012, the Commission established an ['on hold' list](#) of health claims relating to plant substances (botanicals) that may still be used on the EU market under the responsibility of the business operators, provided that they comply with the general principles and conditions of the Claims Regulation and the relevant national provisions,<sup>1</sup> pending a final decision. The Commission staff working document states that, in the current condition, consumers continue to be exposed to unsubstantiated health claims from the 'on hold' list, and may believe that the beneficial effects have been scientifically assessed, while this is not the case.

## Where we stand

The EU food law has evolved in many respects since 2009. For example, as from 2016, the [Food Information to Consumers Regulation](#) ('FIC Regulation') made a [nutrition declaration](#) – specifying the amount of energy, total fat, saturates, carbohydrate, sugars, protein and salt – mandatory for all pre-packed foods.<sup>2</sup> In April 2019, the Commission adopted a regulation setting a limit for [industrial trans fat](#)<sup>3</sup> in food.

Concerning herbal products, the Commission staff working document notes that preparations made from plants are widely available on the EU market, either as foods or as herbal medicines. Their classification as food or medicine is the responsibility of the individual Member States, so a plant substance classified as food in one Member State can be classified as medicine in another. Before being placed on the EU market, [herbal medicines](#) must be assessed and authorised – or registered by means of a simplified 'traditional-use' process – according to EU legislation on [pharmaceutical products](#). [Health claims made on foods](#) should only be authorised after a scientific assessment by EFSA. According to the Commission staff working document, food business operators benefit from the current situation, as they have been able to continue using the 'on hold' health claims on plant substances without having to conduct clinical trials to support their claims. The Commission is currently considering whether 'traditional use' should be accepted as evidence to a greater extent than in the past; around 2 000 'pending claims' are awaiting a decision.

Research has also been done on consumers' understanding of health and nutrition claims. Between 2012 and 2016, an EU-funded research project ([CLYMBOL](#)) studied how health claims and symbols influence consumer understanding, purchase and consumption behaviour. The research found that for consumers to choose healthier products, health claims should not only be understandable, but also need to be presented in a way that is seen as new, to attract attention in the shop. To improve trust, consumers should be (more adequately) informed on the stringent requirements that health claims and health symbols have to fulfil according to EU legislation. The most relevant factor, according to the research, was to focus on ways to improve people's motivation and interest in healthy eating. Furthermore, an [EIT Food](#) co-funded project, ['health claims unpacked'](#), started collecting data in 2019 on consumers from different backgrounds, exploring how a health claim's wording changes its meaning, how this affects consumers' intention to purchase a particular product, and how they prefer health claims to be worded. The research found that consumers consider health claims to be difficult to understand, and lack trust in their accuracy, while manufacturers were sometimes reluctant to use health claims for fear they might be confusing or unattractive to consumers. The research also pointed to a need for new guidelines that take into account linguistic and cultural differences between different EU jurisdictions, as significant differences and preferences already existed between the English, German, French and Polish speakers taking part in the study.

A February 2022 [report](#) from the World Health Organization (WHO) concluded that food marketing still predominantly promotes foods that contribute to unhealthy diets. The most frequently marketed food categories included fast food, sugar-sweetened beverages, chocolate and confectionery, salty/savoury snacks, breakfast cereals, dairy products and desserts. Although marketing unhealthy products to children and adolescents is [restricted](#) in the EU and many non-EU countries, people's 'food environment', which also includes food marketing, influences their food values and dietary practices. The WHO report identified several explicit marketing techniques that appeal to young people, with some studies indicating that engagement with marketing (e.g. actively watching YouTube brand videos or 'liking', 'sharing' or 'commenting on' posts online) was associated with greater impacts on consumption than exposure alone.

To tackle the problem of unhealthy diets, individual countries in the EU and beyond have explored various methods. For example, in [Chile](#) and [Mexico](#), a black-and-white '[stop sign](#)' label on the package of food products warns consumers about high sugar, salt, saturated fat or calorie content. In the United Kingdom, volume promotions of the type 'buy one, get one free' for foods that are high in fat, sugar and salt [will be forbidden](#) from October 2022.

As price is an important factor for many consumers when buying food – the second most important, according to a 2019 [Eurobarometer](#) survey – some argue that unhealthy food should be more expensive than healthy products; this is quite the opposite to what is often occurring now. Following this logic, the more fat and salt a cheese or sausage contains, the more expensive it should be; low-fat, artificially sweetened yoghurt should be cheaper than a full-fat, sugar-sweetened one, and so on. This could possibly be achieved with a government tax on unhealthy foods. [Taxes on sugar-sweetened beverages](#) have been implemented in more than 73 countries worldwide, and some new projects are planned. In Finland, for example, the government has announced that it will review the tax for soft drinks and start preparing a wider tax system review that would favour healthier food products. In Hungary, the price of unhealthy products went up considerably after a '[public health product tax](#)' was introduced. According to the WHO, this has had a favourable impact, with most consumers reducing their consumption of the products targeted.

Some food business operators have already reformulated their products, partly to meet growing [consumer demand](#) for healthier food, and partly in preparation for the possible establishment of nutrient profiles. For example, the European [soft drink industry](#) aims to a 33 % overall reduction in average added sugars in the EU by 2025, compared with 2015 levels. The EU [Audiovisual Media Services Directive](#) encourages the use of codes of conduct at EU level to limit children's exposure to commercials for foods and beverages high in fat, sugar or salt. Under a voluntary [EU pledge](#), food and drink companies, representing over 80 % of food advertising expenditure in the EU, have committed to only advertising products that meet commonly agreed nutrition criteria to under 13-year olds, or not to advertise any products to children at all.

According to the Commission staff working document, for foods such as breakfast cereals, juice drinks, bread, cakes, pastries, and sweet or savoury biscuits, there is evidence that more than a third of those bearing claims continue to have a high fat, sugar or salt content, which may be masked by the use of a nutrition or a health claim on the label. An October 2019 [study](#) found that between 48 % and 68 % of packaged food products in EU markets contain too much fat, sugar and salt to be eligible for marketing to children. Breakfast cereals and yoghurts were often too high in sugars; processed meat and seafood, as well as ready meals, contained too much salt; breakfast cereals did not have sufficient fibre; many yoghurts were too high in total and saturated fats; and the energy content of ready meals was too high.

In its [inception impact assessment](#) of the forthcoming proposals, the Commission notes that consumers do not always understand the nutritional information provided on food packaging and are often unable to find clear and simple nutritional information, which makes healthy food choices difficult. At the same time, different labelling schemes on the EU market do not only result in inequity in consumer access to information, but could also lead to fragmentation of the internal

market, costs for businesses having cross-border activities, and consumer confusion and lack of trust. Currently, all foods are allowed to bear nutrition and/or health claims independently of their content of fat, saturated fat, sugar and/or salt, provided they comply with the legal requirements under the Claims Regulation.

An August 2021 Joint Research Centre (JRC) [study](#) assessed the nutritional quality of food products sold in supermarkets across the EU. While the analysis showed some modest progress, with small reductions in salt, sugar and saturated fat in packaged products sold to citizens, sugar and salt levels were found to still be particularly concerning, and there was little evidence of an increase in fibre content in the foods on offer. There were also significant differences between EU countries.

## European Parliament

Over the years, the European Parliament has consistently advocated food labelling as a means of empowering consumers to make informed choices. However, in the previous parliamentary term, in a 2016 [resolution](#) on the regulatory fitness and performance (REFIT) programme, the Parliament called on the Commission, 'in view of the serious and persistent problems' arising in the implementation of the Claims Regulation, including problems of distortion of competition, 'to review the scientific basis of this regulation and how useful and realistic it is and, if appropriate, to eliminate the concept of nutrient profiles'. The resolution considered that the FIC Regulation had achieved the aims of ensuring that information concerning foods is true, and that specific indications are given concerning fat, sugar and salt content.

In its February 2022 [resolution](#) on strengthening Europe in the fight against cancer, the Parliament calls for a mandatory and harmonised EU front-of-pack nutritional label for food products, based on robust and independent scientific evidence, to encourage and help consumers make informed, healthy and sustainable choices about food products. The resolution also supports fiscal measures to make fresh foods (such as fruits and vegetables, pulses, legumes and wholegrains) more affordable and accessible at national level, in particular for people on low incomes. It encourages Member States to use pricing policies, such as value added tax differentiation, and marketing controls to influence demand for, access to, and the affordability of food and drink low in saturated fats, trans-fats, salt and sugar. Furthermore, it calls on Member States to combat obesity by making available healthy dietary choices, and stresses that individual cancer risks can be reduced by an increased consumption of sustainably produced plants and plant-based foods. According to the resolution, there is a need to address both the over-consumption of meat and ultra-processed products, and of products high in sugar, salt and fat.

Among the recommendations in its October 2021 [resolution](#) on the farm to fork strategy, the Parliament recalls that 'nutrient profiles, which are long overdue, remain pertinent and necessary' to meet the Claims Regulation's objectives. The resolution welcomes the announcement of a legislative proposal to set nutrient profiles, pointing out that many food products, including some marketed to children, continue to use health and nutrition claims despite them having high levels of nutrients of concern. The resolution stresses that a 'robust set of nutrient profiles must be developed' to prohibit the use of nutrition and health claims on foods high in fat, sugar and/or salt, and calls for particular attention to be given to food for children and other special-purpose foods. The resolution also calls on the major food producers and retailers to 'swiftly and seriously reformulate' foods towards a healthier composition.

## Stakeholder views

Consumer organisations have long been stressing the need for better and easy-to-interpret information on the front of food packages. The European Consumer Organisation (BEUC) emphasises that consumers need clear nutrition information upfront, as they make choices in seconds rather than minutes when shopping for food. BEUC has been calling for the adoption of nutrient profiles as a [tool](#) to help do away with health and nutrition claims that give a 'healthy halo

to unhealthy foods'. As BEUC notes, with nutrient profiles in place, if the amount of salt, sugar or saturated fat were higher than the limits set (for instance in a breakfast cereal), the 'high in fibre' nutrition claim could still be allowed, but only if accompanied by a 'high in sugar' [disclaimer](#). BEUC has also called for the Commission to come forward with a proposal for binding EU rules to ban advertising of unhealthy foods to children, including on social media. A September 2021 [report](#) by BEUC highlighted the need for 'rules with teeth', arguing that children are still exposed to unhealthy food ads, despite industry's commitments to market their products responsibly.

In its feedback to the Commission initiative on establishing nutrient profiles, [FoodDrinkEurope](#), the organisation of the European food and drink industry, recalls that over the past decade, many new food labelling requirements have been introduced in the EU, as part of the FIC Regulation and beyond. According to FoodDrink Europe, any additional legislative measures should therefore only be introduced if they are justified by a strong science and evidence base; if they do not cause a barrier to the free movement of goods in the EU single market; if they do not put disproportionate additional burden on companies (in particular small and medium-sized businesses, which make up 99 % of the European food and drink sector); and if there is a clear, demonstrated added value. The organisation notes that in the digital transition era, digital means of communication may play an important role in facilitating additional demands for transparency and information, particularly as food-label space is limited. FoodDrinkEurope says it is strongly concerned with the increase in national rules and uncoordinated, individualistic approaches on food labelling across the EU over the past years, and therefore welcomes the intention to work towards a single, harmonised system in the EU. According to the organisation, the Commission should investigate both mandatory and voluntary options for the possible schemes. FoodDrinkEurope finds it regrettable that the Commission's roadmap refers to non-scientific terminology/dichotomy, i.e. 'healthy' versus 'unhealthy' food, which should be avoided, as it gives a false and misleading message to citizens.

The [United States \(US\) Dairy Export Council](#) (USDEC) warns in its feedback that it is essential to ensure the schemes will help consumers better understand how foods impact overall diet quality, rather than providing an 'at a glance' assessment of only a few nutrients in isolation. USDEC is concerned that schemes focusing only on 'nutrients to avoid', such as sugar, fat and salt, without accounting for the whole food and its contribution to overall health and diet quality, can have unintended consequences. Such schemes often present nutrient-poor foods, such as diet soda, as a healthier choice than nutrient-dense foods that naturally contain higher levels of certain nutrients. Rather than singling out certain nutrients, USDEC encourages the promotion of a healthy eating pattern that focuses on overall diet quality and proper portion sizes, in which the majority of nutrients come from nutrient-dense foods and beverages. USDEC notes that dairy products are good sources of essential, often under-consumed, nutrients including high-quality protein, calcium, phosphorus, potassium, iodine, and vitamins B2 and B12.

[Slow Food Belgium](#) cautions in its feedback against over-simplifying labels, warning that 'those who care about their health may be frightened by products with a simplistic nutritional indication, which, if consumed in reasonable quantities, are not harmful at all'.

The [Food Safety Authority of Ireland](#) notes in its feedback that the use of a single nutrient profile for nutrition labelling, and restricting the use of nutrition and health claims on foods high in fat, sugar and salt is already practiced elsewhere, such as Australia and New Zealand. The authority also points out that nutrient profiles will need to reflect different reference intakes for children and adults, and make consideration for certain food categories such as dairy foods that are naturally higher in fat (cheese) and sugar (yoghurt).

## Outlook

In August 2021, the Commission launched an [external study](#) to support Commission's own impact assessment. According to Commission's plans, the study will run until May 2022. The 12-week [open consultation](#) to gather citizens' and stakeholders' views closed on 7 March 2022. In parallel, the

Commission conducted targeted Member State and stakeholder surveys to collect views on technical aspects of the policy options.

The [package](#) of planned measures to enhance consumer information contains another proposal closely related to nutrient profiles, namely on a harmonised mandatory front-of-pack nutrition labelling scheme to enable consumers make health conscious food choices.<sup>4</sup> In the absence of an EU-wide scheme, some Member States have adopted their own, such as 'Nutri-Score' in Belgium, Germany, Spain and France; 'Nutrinform' in Italy, and the 'Keyhole' symbol in Denmark, Lithuania and Sweden.

Both initiatives are to be proposed by means of a revision of the FIC Regulation. An impact assessment, announced by the Commission, will explore the four options presented in the inception impact assessment mentioned above, and will include the impact of their use on a voluntary or mandatory basis. Setting such labelling requirements would likely generate a cost for food business operators, including non-EU exporters trading with the EU. Similarly, there might be additional enforcement costs for Member State public administrations. On the other hand, harmonised EU-level measures might simplify compliance for operators who are active in several national markets, and establish a level playing field.

The Commission [asked](#) EFSA for [scientific advice](#) to support the development of an EU-wide system. [EFSA's public consultation](#) on the draft opinion closed in January 2022, and EFSA's [scientific advice](#) was published on 19 April 2022. In its advice EFSA concludes, among other things, that decreasing energy intake is important for the European populations, while fibre and potassium intakes are too low in most European adult populations, with inadequate intakes associated with adverse health effects. Moreover, iron, calcium, vitamin D, folate and iodine intakes were found to be inadequate in specific sub-populations. In its advice, EFSA also took into account its opinion on [dietary sugars](#), adopted end of February 2022.<sup>5</sup>

The pandemic has affected people's mental and physical health: a [report](#) by the Organisation for Economic Co-operation and Development (OECD) on Covid-19 and well-being, covering the first 12 to 15 months of the pandemic, noted that more people adopted unhealthy rather than healthy behaviours: 31 % of people gained weight, and 12 % reported consuming more alcohol. On the other hand, 22 % also said they had more time for exercising.

Although vegetables are generally considered beneficial for health, a high vegetable intake alone might [not be enough](#) to reduce the risk of heart disease, as a large study of 400 000 people recently found. Eating a balanced, nutritious diet and keeping a healthy weight are an important part of maintaining good health and reducing the risk of major diseases, including some cancers. According to an [algorithm](#) developed by Norwegian researchers, a middle-aged European male could live up to 12 years longer with an 'optimal' diet, and gain up to six years of life with a 'feasibility approach' diet. In the modelling study, an 'optimal diet' was characterised by a substantially higher intake than a typical diet of whole grains, legumes, fish, fruits, vegetables, and included a handful of nuts, while reducing red and processed meats, sugar-sweetened beverages, and refined grains; a 'feasibility approach diet' was a midpoint between an optimal and a typical Western diet. As the study notes, results indicate that 'for individuals with a typical Western diet, sustained dietary changes at any age may give substantial health benefits', although gains are predicted to be larger the earlier the dietary changes are initiated in life.

## MAIN REFERENCES

[Labelling and nutrition](#), European Commission website.

[Proposal for a revision of the Regulation on Food Information to Consumers \(FIC\)](#), European Commission website.

Laaninen T., [Alcohol labelling](#), EPRS, European Parliament, September 2021.

Laaninen T., [Mandatory origin-labelling schemes in Member States](#), EPRS, European Parliament, September 2018.

Laaninen T., [Nutrition labelling schemes used in Member States](#), EPRS, European Parliament, July 2020.

Rossi R., [Taking the EU's 'farm to fork' strategy forward](#), EPRS, European Parliament, May 2021.

Scholz N., [Europe's Beating Cancer plan – Quick overview and initial reactions](#), EPRS, European Parliament, March 2021.

## ENDNOTES

- <sup>1</sup> Nineteen Member States have adopted national legislation on plants used as foods, mainly through lists of authorised or banned plant substances.
- <sup>2</sup> A nutrition declaration has to show the energy value and the amounts of fat, saturated fats ('saturates'), carbohydrate, sugars, protein and salt, expressed per 100 grams or per 100 millilitres. It may also, in addition, be expressed per portion or per consumption unit of the product.
- <sup>3</sup> An artificial compound that [can be found](#) for instance in cakes, biscuits, cooking oils and spreads, and that is linked to increased risk of heart disease.
- <sup>4</sup> For further information, see an EPRS briefing on [Nutrition labelling schemes used in Member States](#), July 2020.
- <sup>5</sup> Five Nordic countries (Denmark, Finland, Sweden, Iceland and Norway) asked EFSA to update its 2010 assessment and to review recent scientific literature on links between sugar intake and various diseases, such as obesity, type II diabetes, cardiovascular diseases, gout and dental caries. This information is intended to assist EU Member States in setting goals for populations and/or recommendations for individuals in their country.

## DISCLAIMER AND COPYRIGHT

This document is prepared for, and addressed to, the Members and staff of the European Parliament as background material to assist them in their parliamentary work. The content of the document is the sole responsibility of its author(s) and any opinions expressed herein should not be taken to represent an official position of the Parliament.

Reproduction and translation for non-commercial purposes are authorised, provided the source is acknowledged and the European Parliament is given prior notice and sent a copy.

© European Union, 2022.

Photo credits: © bodnarphoto / Adobe Stock.

[eprs@ep.europa.eu](mailto:eprs@ep.europa.eu) (contact)

[www.eprs.ep.parl.union.eu](http://www.eprs.ep.parl.union.eu) (intranet)

[www.europarl.europa.eu/thinktank](http://www.europarl.europa.eu/thinktank) (internet)

<http://epthinktank.eu> (blog)

