

Position Paper

UEAPME¹ position on Nutrient Profiling

What is Nutrient Profiling – The history

The 2006 Claims Regulation (EC 1924/2006) demanded reference values of nutrients in typical foods so that any claim could be justified by the extent that the new food varied from this reference value. These typical levels of nutrient have been called a “nutrient profile”. According to EFSA, “*the term ‘nutrient profile’ refers to the nutrient composition of a food or diet. ‘Nutrient profiling’ is the classification of foods for specific purposes based on their nutrient composition*”. The 2006 Regulation called for nutrient profiles to be set by the Commission by 19 January 2009. This date is now well passed and, as other regulations governing what may be said about a food have been published, it is now doubtful whether the need for nutrient profiles is still valid.

Nutrition claims are not always health claims

Nutrition claims must be seen as separate from health claims. Nutrition claims are statements such as “Low salt”. Health claims may be “The consumption of water can relieve the symptoms of dehydration”. It should be noted that disease reduction claims are prohibited in the legislation.

“Because diets are composed of multiple foods, overall dietary balance may be achieved through eating a variety of foods with different nutrient profiles so that it is not necessary for individual foods to match the nutrient profile of a ‘balanced’ diet”. (EFSA). “The establishment of nutrient profiles should take into account the content of different nutrients and substances with a nutritional or physiological effect, in particular those such as fat, saturated fat, trans-fatty acids, salt/sodium and sugars, excessive intakes of which in the overall diet are not recommended, as well as poly- and mono-unsaturated fats, available carbohydrates other than sugars, vitamins, minerals, protein and fibre. When setting the nutrient profiles, the different categories of foods and the place and role of these foods in the overall diet should be taken into account” (recital 12 of the 2006 regulation).

These two statements appear to be almost contradictory. The former from EFSA takes the pragmatic view that people will not feed only on one product. The latter assumes calculations about the quantities of certain nutrients and other substances contained in each food, such as fat, saturated fatty acids, trans-fatty acids, sugars and salt/sodium together with the role and importance of the food in the diet of the population in general or of certain risk groups including children.

The Food Information Regulation regulates all details

The 2011 Food Information Regulation (EC 1169/2011) demands that the amounts of energy (as kcal and kJoules), fat, saturates, carbohydrates, sugars, protein and salt be put prominently on all pre-packed foods. This must include vitamins and minerals if present in significant amounts. Producers may (if they want to) add the amounts of mono-unsaturates, polyunsaturates, polyols, starch and fibre. Usually only the energy value needs to be on the front of the pack. The Regulation goes into detail about how the manufacturer should calculate the

¹ UEAPME subscribes to the European Commission’s Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is 55820581197-35.

average values. The aim is to facilitate consumer understanding of the contribution or importance of the food to the energy and nutrient content of a diet.

In the light of this new Regulation, which comes into force on 13 December 2014, it is difficult to see how consumers would be better informed if there were to be nutrient profiles of typical foods in addition. The new provisions are accurate and specific to every food. This must leave the consumer in no doubt as to the significance of the food in his/her diet.

Consumers must not be confused

There is evidence that many consumers, particularly those most susceptible to obesity, do not read the details on labels but buy on the criteria of price, taste, pride, convenience and what the children will eat. Thus to set up a duplicate complex and expensive scheme for nutrient profiling may not achieve all the objectives it once had. The need could have been superseded.

Indeed the need to justify all claims may be trying to put too much scientific exactness onto a subject which is changeable by nature. Highly processed foods may be consistent in their profiles. Unprocessed foods may vary according to weather conditions in the growing phase, methods of production and a host of other situations. We would argue that the claims defined in the annex to the 2006 Regulation provide adequate criteria for the assessment of the vast majority of nutritional claims.

There are no healthy and unhealthy foods

UEAPME said in its position paper in 2006 that the answer to the expanding trend towards obesity is persuasion rather than regulation. We still see this to be the case. We would echo the EFSA position that there are no healthy and unhealthy foods – there is only an unhealthy diet. To seek to classify foods as good or bad could lead to many complications later in the form of sanctions, taxes and subsidies. This could be to the considerable disadvantage to small producers who often are sole suppliers of specialist gourmet products which enhance a balanced diet but may be nutritionally incorrect if eaten to excess.

Therefore UEAPME would advise that the Commission report scheduled to be submitted to the European Parliament by 19th January 2013 on the application of the 2006 Regulation should recommend that the need for nutrient profiles has been superseded and that the examples quoted in the annex should be taken as benchmarks for any further applications for specific nutritional claims.

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