

IMACE Position on Suggestions for improvement of the Nutri-Score algorithm

Brussels, 22 July 2024

✂ Foreword

IMACE is supportive of initiatives that aim to provide consumers with easy-to-understand and non-misleading information related to the nutritional characteristics of foods, and beyond the mandatory nutrition declaration pursuant to Regulation (EU) No 1169/2011¹.

IMACE, is of the opinion that such information must be in accordance with transparent and objective criteria based on robust and sound scientific evidence. IMACE endorses the intentions at the basis front-of-pack labelling systems (such as the Keyhole, Nutri-Score NutriInform Battery, etc.) aiming to educate consumers about nutrition and empower better informed choices for healthy diets.

✂ Nutri-Score algorithm should be aligned with the current scientific evidence

The overall nutritional recommendations in Europe and internationally (e.g. WHO guidelines²), advice to replace the saturated fatty acids in the diet by unsaturated fatty acids (mainly poly- and mono-unsaturated fatty acids).

As reiterated at the recent WHO Guideline on “Total fat intake for the prevention of unhealthy weight gain in adults and children”³, in addition to being an important source of energy in the diet, fats and fatty acids play various roles in human physiology. Among other significant roles including an integral structural component of cell membranes, many fatty acids have hormone-

¹ Regulation [\(EU\) No 1169/2011](#) of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004 Text with EEA relevance

² Saturated fatty acid and trans-fatty acid intake for adults and children: WHO guideline. Geneva: World Health Organization; 2023. Licence: CC BY-NC-SA 3.0 IGO.

³ Total fat intake for the prevention of unhealthy weight gain in adults and children: WHO guideline. Geneva: World Health Organization.

like or inflammatory properties and may be involved in diverse physiological processes such as immune function, wound healing and regulation of gene expression. They serve as a carrier for the fat-soluble vitamins A, D, E and K, and support their absorption in the intestine.

Furthermore, a sufficient intake of the essential fatty acids is recommended. The outcome of the Nutri-Score algorithm must reflect the nutritional recommendations on fats to guide the consumer towards the healthiest choices.

The currently proposed Nutri-Score algorithm is not in line with the scientific evidence and the national recommendations, in most EU Member States, regarding the health and nutritional benefits and dietary recommendations for the margarine and spread category.

✂ IMACE proposes the following amendments:

1. Establishing a distinct category “Fats and oils” separately from “Nuts and seeds”, as per nutritional recommendations

The existing Nutri-Score category “*Fats, oils, nuts and seeds*” is extremely heterogenous in terms of their nutrition value, their use in the diet and their eating frequency. Products in this category can’t be used interchangeably by consumers (e.g. oils are not used in the same way as nuts and seeds). Consequently, the proposed algorithm makes it difficult for consumers to identify the healthiest option within a category whose products perform the same function, such as plant- and animal-based fats for spreading and baking.

With the current methodology, if the majority of margarines score “C” they would still come across as “not so healthy” albeit they are rich in PUFA, MUFA and represent the healthiest choice within their category. Ensuring a representation of all the scores (from A to E) would support consumers’ education and lead to more conscious food choices.

Additionally, in terms of choice for healthier products, margarines have long been fortified with vitamins A and D (and intrinsically containing vitamins E and K) making a substantial contribution to the soluble vitamin intake. In terms of public health this is of particularly importance with dealing with the widespread vitamin D deficiencies in the population. As per the Nutri-Score algorithm, consumers are more likely to opt for other products, which could reduce the intake of vitamin D within the population, considering that lack of vitamin D is a public health concern.

Therefore, we believe that nuts and seeds should be into the “general foods” category and leaving “fats and oils” separately. Additionally, it shall be highlighted that nuts and seeds are

good sources of protein (especially in the context of a more plant-based diet), fibres and minerals.

Developing two different categories for “fats and oils” and “nuts and seeds”, would allow the algorithm to be more in line with the profile of fats and oils and would theoretically allow the “healthier” spreads to score an “A” and demonstrate to consumers that there are also margarines and fats that score well.

IMACE is of the opinion that having fats and oils in a distinct category will improve the current algorithm and will make it more informative for the consumers.

2. Assessing the product categories considering the entire score values from A to E throughout

As mentioned above, fat is a major nutrient group, and form and is essential part of a healthy, balanced diet. It is a source of essential fatty acids, which the body cannot make itself. Fat is a carrier and helps the body absorb the fat-soluble vitamins (i.e. vitamins A, D, E and K).

All fats and oils contain a mix of saturated and unsaturated fats [i.e. mono-unsaturated fatty acids (MUFA) and poly-unsaturated fatty acids (PUFA) omega - 3 and omega-6) in different proportions. As part of a healthy diet, it is recommended to cut down on foods and drinks that are high in saturated fats and trans fats and replace them with unsaturated fats (i.e. MUFA and PUFA).

By separating the categories to “fats and oils” and “nuts and seeds”, the scoring distribution should be adjusted accordingly. Therefore, consumers should be able to assess the product categories taking into account the entire score values from A to E. This will provide them with very clear choices what is best and worst choice. With a limited range of products (C, D or E) consumers will not be persuaded to choose the best option. to understand which are the healthiest products within the same category (e.g. spreadable fats).

Some examples of successful FOPNLs using separate category for fats and oils, as proposed above, are the longstanding Swedish “Keyhole”⁴ (also used in Norway, Denmark, Iceland and Lithuania) and the Health Star Rating System⁵ (HSR) of Australia.

⁴ <https://www.livsmedelsverket.se/en/matvanor-halsa--miljo/nyckelhalet>

⁵ <http://www.healthstarrating.gov.au/internet/healthstarrating/publishing.nsf/Content/home>

3. Assessing products on a realistic serving-size based approach

Consumption of margarines “per occasion”, is generally limited to a very low amount per day (i.e. 20 g/day). Based on margarine consumption figures in Europe, IMACE’s agreed reference quantity as serving (or portion) size for margarines and fat spreads is: a) 10 g for table margarines (enough for 1-2 slices of bread); and b) 10 g for cooking margarines (albeit it varies for each recipe).

As explained above, margarine is a product that may be used either as a spread or as an ingredient in cooking and/or baking and not consumed as such. Consequently, the algorithm should take this condition into consideration when allocating (negative) points to these products.

✂ IMACE’s further concerns regarding the current Nutri-Score model

Moreover, we find that the current Nutri-Score model tends to have an oversimplified approach that leaves several ambiguities.

Notably, the distinction between fruit seeds and flower seeds is not consistent. This inconsistency arises from the fact that soybean oil is awarded extra points thus sunflower oil is not. Similarly, olive oil is awarded extra points and rapeseed oil is not. Considering the advantageous fatty acid composition of both oils, their distinction in the Nutri-Score algorithm is not in line with the well-established scientific knowledge that replacing SAFA with PUFA and MUFA has positive health outcomes.

Under the current Nutri-Score calculations, margarines that are often made with sunflower oil and/or rapeseed oil (both low in SAFA) will not benefit from extra points nor will consumers be able to choose the healthier alternative.

The above examples demonstrate that there is discrepancy and lack of scientific reasoning behind the allocation of the food categories, particularly for the fat and oil category being merged with the nuts and seeds.

Furthermore, the “added fats” category brings further confusion to the categorisation.

We believe that significant improvements as explained are needed at the current algorithm.
