NUTRITION UNIT

FAQs on EFSA's scientific advice related to nutrient profiling for harmonised front-of-pack labelling and restriction of claims on foods

Questions about the request and the process

1. What is a nutrient profile?

Nutrient profile refers to the nutritional composition of a food or diet.

2. What is nutrient profiling?

Nutrient profiling is the categorisation of foods based on their nutritional composition using predefined criteria. Nutrient profiling has various applications, e.g. the restriction of advertisement to children, the regulation of nutrition and health claims made on foods, front-of-pack nutrition labelling, nutrition education, product reformulation.

3. What is front-of-pack nutrition labelling?

Front-of-pack nutrition labelling is simplified nutrition information provided on the front of food packaging aimed at helping consumers with their food choices. Under current EU rules on nutrition labelling, the indication of nutrition information on the front-of-pack is not mandatory but could be provided on a voluntary basis by food business operators under certain conditions.

4. What is the role and remit of EFSA on human nutrition?

On human nutrition, EFSA is entrusted with the task of providing scientific advice or scientific or technical support at the request of the Commission and/or Member States.

EFSA does not make recommendations to consumers and is not involved in the regulatory decision process or legislative frameworks regulating foods (including public health policies) in the EU.

5. What scientific advice did the European Commission request from EFSA as input for a future EU-wide system for mandatory front-of-pack nutrition labelling and to inform conditions for restricting nutrition and health claims on foods?

EFSA was asked to identify the nutrients and non-nutrient components of food of public health importance for European populations, the food groups with important roles in European diets,

and to provide scientific criteria to guide the choice of nutrients and non-nutrient components for nutrient profiling for these purposes.

6. Within what timeframe was EFSA required to deliver its scientific advice?

EFSA received the request in March 2021 and was asked to deliver its scientific opinion by the end of March 2022.

7. How did EFSA address this request?

The EFSA Panel on Nutrition, Novel Foods and Food Allergens (NDA) delivered independent scientific advice in response to the Commission's request. The NDA Panel was supported in the preparatory work by the experts of the Working Group on Claims[1] and EFSA's scientific staff.

The NDA Panel relied on the following sources of evidence:

- EFSA opinions on Dietary Reference Values (DRVs), including intake data
- Review publications (systematic reviews and meta-analyses of human intervention and observational studies on health effects of nutrients and food)
- Data from the Global Burden of Disease[2] framework
- Clinical practice guidelines
- Priorities set by EU Member States in the context of their Food Based Dietary Guidelines (FBDG) and associated nutrient/food intake recommendations
- A comprehensive review of front-of-pack nutrition labelling schemes by the Joint Research Centre.
- A questionnaire from EFSA to EU/EEA countries to identify nutrients and non-nutrient components of food of public health importance.

8. Was EFSA asked to set nutrient profiles for front-of-pack labelling and for limiting nutrition and health claims on foods?

No. EFSA was not asked to develop or select a particular nutrient profiling model for front-of-pack nutrition labelling or to advise on current profiling models already in use for different purposes.

EFSA solely provides scientific support.

9. Why does EFSA not provide full advice on how nutrient profiles should be set?

The European Commission requested scientific advice on some specific aspects (see question 5).

EFSA was not asked: whether nutrient profiles should be set for food across the board and/or for categories of food; about an approach for calculating the profiles (threshold vs. scoring systems); about the choice of the reference quantity/basis for nutrient profiles (i.e. per energy,

[1] https://www.efsa.europa.eu/sites/default/files/wgs/nutrition/ndaclaims.pdf

[2] The Global Burden of Disease is a tool for quantifying health loss from diseases, injuries, and risk factors, for use in public health policymaking. It is provided by the Institute for Health Metrics and Evaluation, an independent population health research organisation. See: https://www.healthdata.org/gbd/about

weight or volume unit of the product vs per portion); or, about the feasibility and testing of nutrient profiling models.

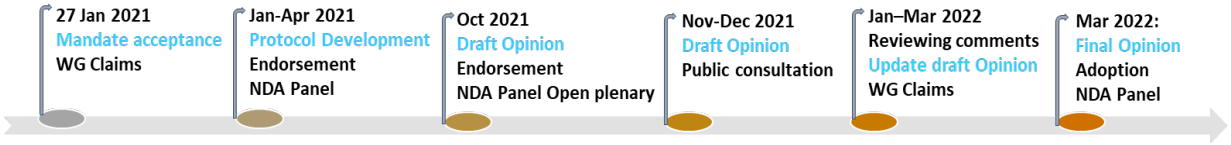
10. How does the 2022 assessment differ from the 2008 scientific opinion?

In 2008, EFSA's scientific advice on nutrient profiles was limited to the purpose of regulating the use of nutrition and health claims made on food.

The 2022 opinion provides scientific advice with two purposes: for the development of harmonised mandatory front-of-pack nutrition labelling; and for the setting of nutrient profiles to restrict the use of nutrition and health claims on foods. In addition, the advice is based on more recent scientific knowledge not available in 2008.

11. Were stakeholders and the public asked for comments?

In line with the principles of openness and transparency, EFSA consulted publicly on a draft of the opinion from 15 November 2021 to 9 January 2022. Stakeholders and the public had the opportunity to submit their comments before the EFSA expert panel on Nutrition, Novel Foods and Food Allergens (NDA) finalised its opinion.



The public consultation (see 'Supporting information' tab) generated 529 comments from 83 organisations and individuals in 21 countries. The feedback helped EFSA to clarify the scope of the assessment and delineate more precisely EFSA's scientific contribution from factors outside EFSA's remit.

Questions about the scientific opinion

12. Does EFSA advise risk managers to use the same nutrient profiling model for both front-of-pack labelling and restricting health claims?

EFSA says that the same scientific considerations could underpin the setting of nutrient profiling models for these two purposes. However, it is a choice for decision-makers as to whether the same model or different models are used for each purpose.

13. Did EFSA consider health benefits or adverse effects of foods which may not be easily explained by their nutrient content?

EFSA considered primarily the relationship between nutrients (macronutrients such as protein, carbohydrates and fat; micronutrients such as vitamins, minerals and water) and non-nutrient components of food (i.e., energy and dietary fibre) and health, but also the relationship between food groups/food categories and health outcomes that cannot be easily explained by their nutrient content (e.g. fruits and vegetables). EFSA relied on existing review publications on the relationship between diet and human health and did not undertake a new systematic review of the literature.

14. Did EFSA pay particular attention to the health benefits of specific diets (e.g. Mediterranean diet) and its characterising products (e.g. olive oil)?

The Mediterranean-style diet pattern and the New Nordic diet-style pattern, also called Baltic Sea diet-style pattern, are mentioned as European dietary patterns associated with lower chronic disease risk when identifying food groups which have important roles in the diets of European populations and subgroups thereof, as requested by the Commission. Olive oil is also addressed within this context with other oils and fats.

15. Did EFSA evaluate the need for exemptions of certain food categories from any nutrient profiling model?

No, EFSA was not asked to advise whether there is a need to exclude certain foods or food groups from nutrient profiling models. EFSA provided advice on food groups that have important roles in diets of European populations and subgroups thereof.

16. Is EFSA ignoring the many scientific papers on food processing effects on human health?

Food processing is considered in different sections of the opinion. However, it is beyond the scope of this opinion to classify foods into groups/categories based solely on the level of processing, or to address the health effects of foods/food groups/categories defined by the level of food processing only.

17. EFSA relied on Dietary Reference Values (DRVs) opinions and the related food composition data used to calculate nutrient intake estimates. Why did EFSA not update its DRV opinions for this work?

The scope of the Commission's request for EFSA's scientific advice did not include the revision of current DRVs for nutrients for European populations, and/or the intake data for different population groups and countries provided in them.

18. Should EFSA not advise the public that nutrition education and a healthy and balanced diet are more important for health than selecting foods based on labelling?

It is up to public health authorities how to prioritise strategies for the prevention of chronic metabolic diseases, including obesity and cardiovascular diseases. EFSA is not involved in these decisions.

19. Why did EFSA not differentiate between nutrient profiling for foods which are naturally rich in certain nutrients and for foods which are fortified with these nutrients?

EFSA was not asked to advise on this issue.

20. Why did EFSA not define food categories for European use?

This is outside EFSA's remit. We are not tasked with the development of harmonised definitions for foods, food groups, or food categories for use in national food-based dietary guidelines or for regulatory purposes.

21. EFSA's opinion advises on the inclusion of nutrients in nutrient profiles for front-of-pack labelling that are not subject to mandatory nutrition labelling, e.g. added sugars, free sugars, potassium. Is a nutrient profiling system based on these nutrients feasible?

EFSA was not asked to advise on the feasibility or testing of a proposed nutrient profiling system. These are considerations for risk managers.