



# EU FARM TO FORK STRATEGY: UNESDA PRELIMINARY CONTRIBUTION

Making the healthier choice the easy choice



# Introduction

UNESDA Soft Drinks Europe fully supports the overall ambitions of the EU Farm to Fork Strategy<sup>1</sup> to deliver sustainable production and consumption.

Our industry welcomes EU-wide approaches that are evidence-based and continue to place food safety centre stage, whilst also securing the competitiveness and dynamism of the food and drink sector.

With a view to making the “healthier choice the easy choice” - a key pillar of the Strategy - UNESDA’s principal focus will remain on continuing to reformulate for sugar and calorie reduction and on promoting no- and low-calorie soft drinks, such as via a harmonised system of front-of-pack nutrition labelling which is one of the major aims of the Strategy.

We are pleased to set out here our initial summary viewpoints on these issues. In the coming months, we will be publishing separate and more detailed topic-specific positions.

## Our three key asks for the implementation of the Farm to Fork Strategy



**Transparent and inclusive stakeholder consultation, including comprehensive impact assessments**



**Implementation based on sound evidence - especially bearing in mind the Farm to Fork Strategy’s guiding principle that there are no unhealthy foods, but there are unhealthy diets**



**Harmonised and fair implementation across Europe, ensuring critical mass as appropriate without singling out any specific sector**

# A spotlight on some of the policy topics in the Farm to Fork Strategy that are key for UNESDA

## 1. Front-of-pack nutrition labelling: let's make it EU-wide and harmonised

UNESDA applauds the Strategy's goal of **making healthier diets the easy choice**. This is a clear acknowledgment that while there are no healthy or unhealthy foods, there are healthy and unhealthy diets. Improving diets will only work by encouraging balanced food and drink choices to achieve an optimal intake of nutrients and calories, bearing in mind a complex web of factors such as physical activity levels, age, overall health and portion sizes.

**A key driver for encouraging healthier diets is ensuring that the consumer is provided with easily comprehensible, “at a glance” front-of-pack nutrition labelling for more informed choices.**

UNESDA's firm belief over many years has been that our consumers should have access to front-of-pack nutrition labelling. In 2008, **UNESDA was among the first food and drink sectors in the world** to voluntarily provide the amounts of calories and sugar in a serving of soft drink and what these represent as a percentage of total 'guideline daily amounts' for calories and sugar. This is known as 'Guideline Daily Amount' or 'Reference Intake' labelling. As a first mover on front-of-pack labelling, UNESDA is enthusiastic to build on its experience and to share learnings and insights.

The host of front-of-pack nutritional labelling schemes which have since emerged across Europe are a prime example of the consequences of a lack of EU-wide direction which fragments the single market and compromises EU competitiveness. This was acknowledged in the Commission's report on front-of-pack nutritional labelling published on 20 May 2020<sup>2</sup> in which it was mentioned that “... *different FOP schemes are recommended by different Member States, which can result in additional labelling costs for food business operators if they want to use the recommended label and have to change the packaging in function of the national market concerned*”.

Furthermore, and even more importantly, the plethora of schemes have the potential to confuse consumers as confirmed by the European Commission's Joint Research Centre in its recent review of front-of-pack nutrition labelling schemes: “*The presence of many schemes may generate information overload*”. Furthermore, the same food/ingredient can score differently under the various schemes.

The table on the next page, extracted from this Joint Research Centre report<sup>3</sup>, provides a useful overview of the most relevant schemes.



2. [https://ec.europa.eu/food/sites/food/files/safety/docs/labelling-nutrition\\_fop-report-2020-207\\_en.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/labelling-nutrition_fop-report-2020-207_en.pdf)  
3. [https://publications.jrc.ec.europa.eu/repository/bitstream/JRC113586/kjna29811enn\\_1.pdf](https://publications.jrc.ec.europa.eu/repository/bitstream/JRC113586/kjna29811enn_1.pdf)

Proposed FOP labelling typologies and examples of corresponding FOP schemes (implemented or proposed) in EU Member States and the UK

FOP label studies and their proposed terminology						
Feunekes <i>et al.</i> (2008)	Hodgkins <i>et al.</i> (2012)	Newman <i>et al.</i> (2014)	Savoie <i>et al.</i> (2013)	Julia & Hercberg (2017)	Examples	
More complex schemes	Non-directive	Reductive (non-interpretative)	Nutrient-specific labels	Numerical	Reference Intakes label	
					NutriInform Battery (Italy)	
	Semi-directive	Evaluative (interpretative)		Colour-coded	UK MTL label	
				Traffic-light label		
Simple schemes	Directive	Evaluative (interpretative)	Summary indicator labels	Endorsement schemes ('positive logos')	Keyhole	
					Heart/Health logos	
					Healthy Choice	
					Graded indicators	Nutri-Score

Abbreviations: MTL, Multiple Traffic Lights; SENS, Système d'Etiquetage Nutritionnel Simplifié.

## UNESDA POSITION

🌱 Eager to work constructively with policymakers and wider stakeholders in support of Farm to Fork's call to establish an EU-wide, harmonised front-of-pack approach to nutrition labelling that:

- 🌱 is meaningful for consumers
- 🌱 helps consumers of soft drinks to choose lower sugar options
- 🌱 is built on sound evidence in line with EU legislation (especially the EU Nutrition and Health Claims Regulation 1924/2006 and the EU Food Information to Consumers' Regulation 1169/2011)

- 🌱 reflects the dietary needs and habits of all EU consumers
- 🌱 incentivises producers to reformulate and offer consumer choice
- 🌱 is transparent and regulated under EU governance.



## 2. Marketing practices: Support for the Farm to Fork proposal for an EU Code of Conduct

The pioneering and wide-ranging UNESDA commitments to act responsibly towards children, adopted back in 2006, inspired a host of worldwide self-regulatory measures.

Since this date, under the UNESDA umbrella, member companies have committed to **not advertising or marketing** ANY of their products to children under 12. Not on TV, in print, online or on social media.

When it comes to the **school setting**, the industry commits to not offer ANY of its products for sale in primary schools in the EU; and in secondary schools, if UNESDA members sell their products at all, they commit to offering soft drinks only in unbranded vending machines. In 2017, UNESDA tightened its secondary school commitment to pledge that only no- and low-calorie drinks should be sold across all secondary schools in the EU.

These commitments are regularly monitored by independent auditors - such as PwC - who have confirmed high levels of compliance.

### UNESDA POSITION

👂 Supports the Farm to Fork ambition to draw up an EU Code of Conduct to cover marketing practices and other aspects

👂 Continue to share our learnings on establishing self-regulatory commitments and to evolve our dynamic, self-regulatory approach in anticipation of the changing context - such as the way in which our consumers interact with new media.

## 3. Reformulation and maximum nutrient levels: calling for evidence-based and sustainable solutions across the food and drink sector

We note that in the Farm to Fork Strategy action list, initiatives for the reformulation of processed foods are to be sought, along with establishing maximum levels for certain nutrients.

Balanced nutrition comes from responsible and individual food and drink choices to achieve an optimal intake and expenditure of nutrients and calories. This depends on a complex range of factors such as physical activity levels, age, overall health, portion sizes and dietary preferences.

**For around 50 years, the soft drinks industry has been the ONLY food and drink sector able to offer its consumers alternative sugar-free products**, thereby supporting those individuals wishing to reduce their calorie intake.

Over the past 20 years, calorie reduction has sped up with UNESDA members **cutting the average content of added sugars in soft drinks by 22.5% between 2000-2017**. Some 25% of all soft drinks sold in Europe today are no- and low-calorie, and in some markets the market share of no- and low-calorie drinks is more than 60%.

UNESDA remains the only sector to have formally committed to the 2015 European Commission initiative to reduce added sugars, pledging to reduce average calories in soft drinks by 10% between 2015-2020. Through intense voluntary efforts, our members met the 2020 target well ahead of time, already achieving a 11.9% reduction by 2017.

The commitment made by UNESDA at pan-European level has prompted several similar pledges at national level around Europe, with many involving public-private partnerships.

Meeting our target calorie reduction well ahead of time has only served to intensify our efforts in continuing on our calorie reduction journey.

### Just a few examples of the many recent successes in sugar and calorie reduction by UNESDA members at national level

**Belgium:** The soft drinks industry in Belgium is well on its way to achieving the 25% reduction in sugar content that was announced by the Belgian soft drinks association for the period 2000-2020. Monitoring from 2016 already showed a 22% decrease in average sugar content and companies are continuing with their efforts.

**Netherlands:** The Dutch Association of Soft Drinks, Waters & Juices announced in July 2020 that the industry had reached its interim target of a 25% reduction in calories in its products compared to 2012. The reduction was achieved in 2019 - one year ahead of the deadline of 2020.

**Slovakia:** The Slovakian soft drinks association made an umbrella commitment to reduce sugar and calories by 12% between 2000-2015 and by an additional 10% between 2015-2020. Examples of the impressive results include those from a local producer declaring it has reached a 10% reduction over the last 5 years, and the announcement from another producer that sugar-free beverage sales now represent a 20.7% share of their portfolio.

**Slovenia:** In 2015, 10 soft drinks producers (representing more than 90% of all soft drinks producers in Slovenia), voluntary and officially committed to a range of commitments. These included reducing added sugar and calories and providing more reformulated products. In 2019 alone, the companies reported that they placed on the market over 70 new products with improved nutritional value.

**Spain:** The soft drinks sector in Spain reduced overall sugar content by 23% between 2005 and 2014. The industry then went further by committing to reduce average sugar content in all soft drinks by 10% between 2016 and 2020.

Furthermore, when it comes to consumption by children, reports from the WHO published in 2020, “Health Behaviour in School-aged Children” (available [here](#)<sup>4</sup> and [here](#)<sup>5</sup>), show that **the frequency of consumption of sugar-sweetened beverages has decreased consistently across Europe by more than 40% on average since 2001**. This data demonstrates that industry efforts on responsible marketing, on removing full calorie products from secondary schools and all soft drinks from primary schools - are paying off and that meaningful self-regulatory initiatives can make a difference. The data also shows **there is no correlation between the frequency of consumption of sugary drinks and overweight and obesity of children in Europe**, confirming that obesity is a complex issue that is not attributable to one factor.

4. <https://www.euro.who.int/en/health-topics/Life-stages/child-and-adolescent-health/health-behaviour-in-school-aged-children-hbsc/publications/2020/spotlight-on-adolescent-health-and-well-being-findings-from-the-20172018-health-behaviour-in-school-aged-children-hbsc-survey-in-europe-and-canada-international-report-volume-1-key-findings>  
5. <https://www.euro.who.int/en/health-topics/Life-stages/child-and-adolescent-health/health-behaviour-in-school-aged-children-hbsc/publications/2020/spotlight-on-adolescent-health-and-well-being-findings-from-the-20172018-health-behaviour-in-school-aged-children-hbsc-survey-in-europe-and-canada-international-report-volume-2-key-data>

The 2019 OECD report ‘[The Heavy Burden of Obesity - the economics of prevention](#)’<sup>6</sup> identifies specific policy packages as particularly helpful for countries to adopt. These include measures such as labelling, smaller pack sizes, regulation of advertising to children and reduction in calorie content. In addition to reformulating existing products, our commitment on sugar reduction uses a combination of levers - as identified by OECD - to nudge consumer choice and create healthier diets. These include innovating to develop new products with lower sugar profiles, placing promotion behind no- and low-calorie options and reducing pack sizes to support our consumers in portion control.

When it comes to reformulation, as clearly indicated by the [Dutch Presidency in its Roadmap for Action on Food Improvement](#)<sup>7</sup>, a gradual reduction of nutrients is required “... *to maintain consumer acceptance...*”. In addition, as also clearly identified by the Dutch Presidency, “... *technological possibilities, food safety and sustainability goals can influence the possible results of food product improvement*”.

Successful initiatives to drive healthier consumption habits also need to consider the diet as a whole. Diets across Europe are very culturally diverse so there is no one-size-fits-all approach.

Measures that discriminate against certain foodstuffs or nutrients can have undesired effects, prompting substitution and compensation via other foodstuffs. Setting maximum levels of certain nutrients which is proposed in the Strategy, without a clear rationale, may eventually lead to the disappearance of consumers’ favourite food and drinks - as well as some traditional foods which are an essential component of our rich and culturally diverse EU. Furthermore, we would suggest that any proposals for such measures should be accompanied by science-based assessment and full stakeholder consultation.

## UNESDA POSITION

- ☞ Supports the overall Farm to Fork ambition to stimulate reformulation
- ☞ Securing critical mass will be crucial to success
- ☞ Convinced that more needs to be done to encourage reformulation across the entire food and drink sector to really make a collective difference to the intake of nutrients across the population
- ☞ Favours widening reformulation initiatives but is strongly opposed to setting maximum levels of

nutrients. Not aware of any evidence that this will be effective in improving diets. Any such initiative would stifle innovation and seriously impact the competitiveness of the European food and drink industry - all without any discernable impact on public health

- ☞ Considers that encouraging widespread voluntary reduction of nutrients and innovative reformulation across the entire food and drink sector will be far more effective and sustainable.

## 4. Nutrient Profiles: Support the establishment of nutrient profiles to determine use of nutrition and health claims

UNESDA supports the Farm to Fork ambition for a legislative proposal establishing nutrient profiles to determine the use of nutrition and health claims, in line with the Nutrition and Health Claims Regulation 1924/2006. This Regulation sets out the principles and conditions which the European Commission, upon the advice of EFSA, should take into account for defining those nutrient profiles.

In its 2008 [opinion](#)<sup>8</sup> on nutrient profiles, EFSA highlighted that beverages are “*important for hydration*”.

UNESDA believes that, in order to be successful and progressive, certain parameters are important to consider for setting nutrient profiles, such as they:

- be based on scientific knowledge about diet, nutrition and the relation to health
- be set so as to encourage innovation
- only be related to diet, nutrition and the relation to health, and not to food safety which is regulated elsewhere in EU legislation
- consider foods by category, not discriminate against any food or ingredient, be simple and applicable by all food operators.

6. [https://read.oecd-ilibrary.org/social-issues-migration-health/the-heavy-burden-of-obesity\\_67450d67-en#page1](https://read.oecd-ilibrary.org/social-issues-migration-health/the-heavy-burden-of-obesity_67450d67-en#page1)

7. [https://ec.europa.eu/health/sites/health/files/nutrition\\_physical\\_activity/docs/2016eunpresidency\\_roadmap\\_en.pdf](https://ec.europa.eu/health/sites/health/files/nutrition_physical_activity/docs/2016eunpresidency_roadmap_en.pdf)

8. <https://www.efsa.europa.eu/en/efsajournal/pub/644>

## UNESDA POSITION

☞ Has supported the setting of nutrient profiles for claims since 2008. Therefore welcomes the Farm to Fork ambition for a legislative proposal to establish nutrient profiles for health and nutrition claims - so long as certain conditions, as outlined above, are met

☞ Opposes a proliferation of different nutrient profile schemes used for different purposes.

## Conclusion: Let's collaborate constructively to ensure Farm to Fork is fit for use around the world

### UNESDA supports:

- a harmonised, EU-wide front-of-pack nutrition labelling scheme and is keen to work with policymakers and stakeholders in sharing our knowledge and expertise to create it
- the Farm to Fork ambition to draw up an EU Code of Conduct to cover marketing practices and other aspects, such as reformulation
- Farm to Fork's ambition to stimulate reformulation as we are convinced that more needs to be done to encourage this across the entire food and drink sector
- the setting of nutrient profiles for claims and welcomes Farm to Fork's ambition for a legislative proposal to establish nutrient profiles for health and nutrition claims.

### UNESDA encourages:

- widespread voluntary reduction of nutrients and innovative reformulation across the entire food and drink sector as effective and sustainable.

### UNESDA opposes:

- setting maximum levels of nutrients
- a proliferation of different nutrient profile schemes used for different purposes.

To ensure that European citizens are best served, their needs, aspirations and desires must be placed at the very heart of Farm to Fork implementation. Successfully meeting consumer expectations will mean that policies must drive for effective, evidence-based action right across the EU food chain.

As UNESDA we are committed to ensuring that the "healthier choice is the easy choice" in line with one of the key pillars of the Strategy. We will continue on our own journey to create a healthier food environment and help people to make better and informed choices, whilst continuing to implement the host of commitments we have made covering marketing practices.

UNESDA makes a strong call for collaborative, constructive and evidence-based action from all stakeholders - policymakers, industry and all relevant interest groups.

This will ensure that the ambitious strategy not only delivers for EU consumers, but that it is 'fit for purpose' with the capacity to become the global blueprint for sustainable production and consumption.

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