

## ECDA's response - Public consultation on Inception Impact Assessment "Food labelling: revision of rules on information provided to consumers"

The European Chronic Disease Alliance (ECDA) welcomes the opportunity to provide input on the Commission's inception impact assessment on an EU system on front-of-pack (FOP) nutrition labelling, envisioned as a cornerstone of consumers' understanding of the nutritional value of foods as part of the Farm to Fork Strategy. Such a scheme should fully promote and safeguard public health in Europe.

To successfully do so, ECDA recommends that the EU-level system be **mandatory for all EU member states, interpretative and uniform**.

Such a scheme has the potential to lower the prevalence and mortality of diet-related non-communicable diseases (NCDs) in the EU. Indeed, it is estimated that over 950,000 deaths and over 16 million DALYs are attributable to dietary risks due to unhealthy diets every year across the EU. A fully-harmonised, mandatory, simplified, interpretive FOP nutrition labelling scheme would contribute to healthy environments, as well as empower consumers to make informed healthy food choices.

Various recent studies find that interpretative schemes are most effective at improving consumers' understanding of the nutritional quality of foods and perform well with lower socio-economic groups, who are amongst the most vulnerable groups to dietary risk factors. Further, these schemes have gained considerable traction and are becoming more widely implemented across Europe.

It is essential that the future scheme takes into account national food-based dietary guidelines, to be appropriate for disease prevention; and be defined with the input from a scientific committee of independent experts which should be transparent and free from conflicts of interests. Findings and recommendations from the group should be available publicly and open for consultation.

Further, we would like to stress the following points:

- A mandatory approach is essential to ensure that all food and drinks are included. Hence, ensuring that all people living in the EU benefit from an evidence-based FOP nutrition labelling system with high coverage of products on the market. Exemptions will undermine the aim of the system to be implemented uniformly and consistently, and efforts to maximise its impact.
- Uniform reference values (e.g. per 100g or ml) should be indicated for all products.
- A thorough FOP labelling policy monitoring and evaluation programme should be put in place to ensure appropriate roll out of the scheme and effectiveness.

The selected policy option should not only help citizens make healthy choices, but also improve reformulation of processed products towards healthier formula (with less fats, sugars and/or salt), another objective of the Farm to Fork strategy. The assessment of options should therefore take into account the extent to which implementation of FOP labelling has or can stimulate reformulation and restrict the promotion of products high in fats, sugars and/or salt (HFSS).

ECDA recommends that the European Commission assesses the policy options in that regard.