Brussels, 22 September 2022

**Nutriscore changes, but problems remain:**

**the system misleads consumers**

**The Nutriscore Scientific Committee recently revised the algorithm for a umber of categories, including vegetable oils, but failed to ensure informed choices towards healthier products.**

**Therefore, the possibility of adopting Nutriscore as a harmonised front-of-package labelling model for the EU remains a major public health concern.**

The Nutriscore system, a food label that assigns nutritional scores to food products from A (most favourable) to E (least favourable), has **recently revised its algorithm** for a number of categories. With this move, the Nutriscore Scientific Committee sought to remedy some of the system’s shortcomings, in particular the previous disregard for certain nutritional characteristics, such as the presence of unsaturated fats and other nutrients recognised for their proven benefits in a healthy diet. But it **failed to address the existing problems**.

**SAFE conducted an in-depth analysis of the Nutriscore** and its implications for consumer choice and published its findings in the report **“(Mis)Understanding Nutriscore – Analysis of the algorithm shortcomings”** (read the full report [here](https://www.safefoodadvocacy.eu/wp-content/uploads/2022/09/SAFE-Nutri-Score-Report-September-2022.pdf)).

The report highlights **worrying discrepancies between the results of the Nutriscore and those of other labelling systems for the same products**, as well as inconsistencies, gaps and flaws that make the system i**nadequate to properly guide consumers towards healthier food choices.**

**Comparison of Nutriscore and other labelling systems**

SAFE conducted a **comparative analysis** of the results of the Nutriscore with those of other labelling systems used in other countries: **NOVA** (a classification of foods according to the extent and purpose of their processing), **Siga** (a scientific score to assess the level of processing of foods) and the **food warning labels adopted in Mexico** to indicate excess fat, sodium, sugar or calories.

The analysis revealed some worrying inconsistencies: **Nutriscore results often appeared much more favourable than those of other systems in relation to ultra-processed or high-sugar products**. For example, an organic cereal brand rated B according to Nutriscore scored worst according to NOVA (4) and Siga (7) as an ultra-processed food to be restricted and a warning label for excessive sugar according to Mexican standards. The same results were obtained for a cocoa powder classified as B (which also had a warning label for excess calories according to Mexican standards, in addition to the warning for sugar) and for a bolognese sauce classified as A (which also had a warning label for excess sodium according to Mexican standards, in addition to the warning for excess sugar).

**Ineffectiveness of the algorithm review on oils**

The revision of the algorithm **is aimed at improving the evaluation method for some categories of products** (fatty fish, cheese, cereals, vegetable oils, among the others). **For vegetable oils, the review will result in an overall improvement of the scores** (from C/D to A/B), based on the presence of monounsaturated fats, which were previously not considered. However, it **produced further distortions**: for example, extra virgin olive oil (77g/100 monounsaturated fat) and olive pomace oil (8g/100 monounsaturated fat) both score A. Besides the difference in monounsaturated fat, these two oils also contain different amounts of vitamins A and E, which are known for their anticarcinogenic and antioxidant effects. This could lead consumers to opt for the cheaper olive-pomace oil in the mistaken belief that the latter is nutritionally equivalent to the much healthier extra virgin olive oil.

Furthermore, **the calculation on 100 g/ml and not per portion can mislead consumers** and does not comply with the European regulation. While this system seems to work well in evaluating the nutritional score for multi-ingredient products (the score given on 100 grams of pizza considers the exact proportion of each ingredient, such as ham, cheese, fat, etc.), it appears inadequate for single-ingredient products, as it refers to an amount that does not correspond to a consumer’s potential intake.

**Other unresolved problems in the application of Nutriscore**

SAFE has repeatedly expressed doubts about the effectiveness of the Nutriscore, which scores food products using a calculation that considers the amount of nutrients to be favoured (fibre, protein, fruit or vegetable content) minus the sum of nutrients to be limited (simple sugars, saturated fatty acids, salt). The **criticism concerned several features of the assessment method which have not changed with the recent revision**. The main shortcomings of Nutriscore are as follows.

**Nutriscore’s rules of use mislead consumers.** There are enforcement rules unknown to consumers, which are applied differently depending on the product and the desired result, thus providing incorrect nutritional information. Whereas consumers should be supported in their choices with clear and consistent rules.

In particular, the **Nutriscore of a product can be calculated after its preparation (as prepared), based on preparation methods provided by manufacturers, or before its preparation (as sold).** For example, **cocoa powder** benefits from the first system, which leads to it being given a B score despite the high percentage of sugar, because the product has to be diluted with milk (and given the high percentage of milk in the final prepared product, it is not considered a beverage, so it benefits from a more lenient consideration).

For products such as **Chips, breaded meat or fish**, the Nutriscore is calculated before preparation and usually yields A or B scores, even if consumers cook these products with a certain amount of fat. If the entire process were taken into account, the final score would be different, one or two notches higher, depending on the type and amount of fat used.
 **Nutriscore does not take into account the degree of processing of the product.** As SAFE’s benchmarking results show, the Nutriscore **does not assign a negative score to ultra-processed foods**, which are known to be detrimental to health. A recent Spanish study found that more than 20% of the products tested scored very good with the Nutriscore and very bad with the NOVA. This is a serious problem: the most recent and reliable studies1 show that a diet rich in UPF is associated with an increased risk of cardiovascular disease, cerebrovascular disease and mortality.

**It disregards some natural substances that are beneficial to health, while neglecting harmful ingredients.** There are a number of **positive elements not considered** by Nutriscore, even though the Food Information to Consumers Regulation (FIC) requires them to be taken into account. These are natural substances that have been widely recognised as being beneficial to human health (unsaturated fats, vitamins, minerals, polyphenolomega-3 fatty acids, etc.). Failure to consider the amount of these positive nutritional elements can mislead consumers, who may be tempted to buy products with little health benefit and discard others. On the other hand, the Nutriscore model does not consider **important information such as the presence of harmful additives and dyes and endocrine disruptors**.

**SAFE calls for clear and easy-to-understand rules on nutrition labelling**

**SAFE sees the Nutriscore as an ineffective tool** to help consumers distinguish between healthy and unhealthy products, as it is based on incomplete and overly simplistic criteria. The high percentage of chronic diseases in Europe and the increasing consumption of nutrient- and fibre-poor foods raise serious questions about the most appropriate tools to address these problems.

The **ongoing revision of the Food Information to Consumers (FIC) regulation** aims, among other objectives, to help society move towards a healthier and more sustainable diet. In addition, the Commission intends to propose legislation on the provision of additional nutrition information.

SAFE believes that in order to enable consumers to choose healthy and balanced diets, the new European framework must take s**everal important aspects into consideration:**

* The **negative features** of the Nutriscore highlighted in the SAFE report **should not be included in the proposal** that the European Commission will present in the coming months for a harmonised EU-wide front-of-package (FOP) label.
* The **new supplementary nutrition labelling scheme** should be based on the **actual amount of food consumed**, with indications per portion or per consumption unit, adhering to what is already required by the FIC Regulation in Article 32(5).
* It should take **into account all the positive and negative elements** foreseen in Article 30(1)-(5) of the Regulation.
* The Commission should require that the new system **be subject to a review period** of its effectiveness of at least three years before its final adoption.
* The Commission should take into account **recent scientific studies on ultra-processed products** and propose specific labelling measures for this type of product.

**About SAFE**

SAFE –  *Safe Food Advocacy Europe* was created with the aim of ensuring that consumer’s health and concerns remain at the core of the EU’s food legislation.  SAFE is  currently the only Brussels-based NGO specialised in the protection and representation of EU consumers in the food sector.  SAFE strives to ensure safer food standards for consumers  monitoring the EU food legislation process  and cooperating with EU stakeholders to draft  comprehensive food regulations.    SAFE notably supports the development of policies and awareness-raising actions which jointly address  health, environment, food safety and sustainability, all-the-while being involved in several  EU-funded projects  aimed at reducing the environmental impact of the food sector, increasing sustainability and promoting healthier food environments for consumers.