



"Achieving consensus on the science of food regulations and legislation to ensure the global availability of safe and wholesome food products for all consumers"

22 April 2021

To:
Dr. Valeriu Curtui,
Head of Nutrition Unit at EFSA

From: The Global Harmonization Initiative Working Group on Nutrition

Subject: A Global Harmonization Initiative Nutrition Working Group opinion on the development of harmonized mandatory front-of-pack nutrition labelling and the setting of nutrient profiles for restricting nutrition and health claims on foods

Dear EFSA Colleagues:

The Global Harmonization Initiative (GHI) is an international non-profit organization with a network of individual scientists working together to promote the harmonization of global food safety regulations and legislation. The organization engages and empowers food scientists in industry, government and academia to voice scientific consensus and make recommendations on food safety laws and regulations, globally. GHI is an approved academic stakeholder of EFSA. Members of GHI act as individuals, never representing their employers. Non-dues membership requests are evaluated for each applicant and contributions to GHI are based on the scientific conscience of the members. To protect the impartiality of GHI, no funds are accepted from governments or industries.

The Global Harmonization Initiative has a working group on food nutrition (GHI-WGN) which is an impartial stakeholder regarding the food legislation harmonization process at the EU and international levels. The WGN, one of the organization's 16 working groups would like to provide their expert view regarding nutrition labelling and nutrient profiles and health claims on foods.

Addressing the EFSA Mandate M-2021-0007 (EFSA-Q-2021-00026) "Request to the European Food Safety Authority for scientific advice on the development of harmonized mandatory front-of-pack nutrition labelling and the setting of nutrient profiles for restricting nutrition and health claims on foods", the GHI-WGN is of the opinion that:

Nutrition labelling needs to serve the final consumers in their daily food selections, helping them towards healthier food choices for their household with respect to appropriateness for factors such as ages, genders, health status, and personal and social preferences of the household members.

Also, the front-of-pack (FOP) labelling needs to encourage the global food industry and trade system to move in the direction of better nutritional food compositions and more tailored food formulations for special nutritional needs.

The GHI-WGN recommends that the issues to be initially considered in implementing the EU harmonized FOP nutrition labelling should include the following:

- I. **The FOP should harmonize mandatory food information:**
 - a) Food identity: descriptive name, country of origin (pictorial logo or descriptive), business producer name (pictorial logo or descriptive), a fair pictorial food image, the net quantity, number of portions per package (pictorial logo or descriptive);
 - b) Food composition: List of up to three ingredients, inclusive of the primary ingredient
 - c) Food nutrient nature (such as vegetable, animal, substitute/imitation/formed/cultured: chemical, GMO/non GMO, lab-cultured from stem cells);
 - d) Mandatory nutrition declarations: Energy value, amount of energy percentage of the Dietary Reference Values (DRV);
 - e) Nutrition and health claims: using up to three nutrition and health logos;
 - f) Safe condition of food use: such as allergens or intolerance-inducing ingredients, date of minimum durability and pictorial use instructions.

- II. **The FOP harmonized additional forms of expression and presentation should accomplish the seven requirements established in Article 35 from Chapter IV of the EU Regulation No. 1169/2011:**
 - a) They are based on sound and scientifically valid consumer research and do not mislead the consumer as referred to in Article 7;
 - b) Their development is the result of consultation with a wide range of stakeholder groups;
 - c) They aim to facilitate consumer understanding of the contribution or importance of the food to the energy and nutrient content of a diet;
 - d) They are supported by scientifically valid evidence of the understanding by the average consumer of the forms of expression or presentation used;
 - e) For other forms of expression: they are based either on the harmonized reference intakes set out in Annex XIII, or in their absence, on generally accepted scientific advice on intakes for energy or nutrients;
 - f) They are objective and non-discriminatory; and
 - g) Their application does not create obstacles to the free movement of goods.

The opinion of the GHI-WGN is that these seven requirements need to be met for any harmonized mandatory front-of-pack nutrition labelling system.

- III. The concept of FOP nutrition labelling needs to be integrated and harmonized in the existing EU Regulation No. 1169/2011 regarding the “field of vision” or “principal field of vision”.

- IV. All the information provided on the food label should support the consumer in making beneficial food choices using a **honest, accurate, clear, easy-to-read and understandable food label**, including **mandatory and voluntary forms of expression on the front of the package** and a **harmonized format for descriptive, pictorial and tabular format information** such as mandatory number and information type size minimums, proportional size, contrasting colours, and position on the label regarding the foods’ nutritional value scoring/grading, identity and authenticity of food pictorials or logos, nutrition and health claims logos, origin, number of servings logos, conditions of standard preparation, and packaging recycling information.

Also, please consider our **Global Harmonization Initiative (GHI) Nutrition Working Group** input in moving the issue of harmonization of global nutrition legislation forward by consulting the following contributions:

Current legislations in nutrition and issues requiring global harmonisation. Quality Assurance and Safety of Crops & Foods, 2019; 11(7): 593-601. <https://doi.org/10.3920/QAS2018.1388>.

Vintilă, I., 2019. Global issues in harmonization of nutrition legislation, 1st GHI World Congress on Food Safety and Security, 24-28 March, Leiden, Netherlands. <https://ghiworldcongress.org/>.

Vintilă, I., 2019. New paradigm in Global Harmonization Initiative of nutrition legislation, 1st GHI World Congress on Food Safety and Security, 24-28 March, Leiden, Netherlands. <https://ghiworldcongress.org/>

With our best regards,



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