



RESPONSE TO THE EUROPEAN COMMISSION'S CONSULTATION ON THE REVISION OF EU LEGISLATION ON FOOD INFORMATION TO CONSUMERS

Alcohol Focus Scotland (AFS) is the national charity working to prevent and reduce alcohol harm. We aim to reduce the impact of alcohol in Scotland through the implementation of effective alcohol control policies and legislation. AFS welcomes the opportunity to respond to the European Commission's consultation on the revision of EU legislation on Food Information to Consumers.

Summary

We support the mandatory inclusion of complete, simplified, and easy to read nutritional information. We strongly agree with the labelling guidance around alcoholic drinks to be brought in line with other foods and beverages on a mandatory basis and not to be included voluntarily by the alcohol industry.

Front of pack nutrition labelling and setting nutrient profiling criteria to restrict claims

Q1: To what extent do you agree with the following statements:

Nutrition labelling on the front-of-pack is an important tool to improve the population's dietary habits – **Strongly agree**

Consumers pay more attention to nutrition information on the front-of-pack compared to the nutrition declaration on the back-of-pack – **Strongly agree**

Simplified and easy to understand nutrition information on the front-of-pack helps consumers to make healthier food choices – **Strongly agree**

Nutrition information on the front-of-pack should be consistent with dietary guidelines – **Strongly agree**

Consumers should have access to the same front-of-pack nutrition label across the whole EU – **Strongly agree**

Food businesses should be subject to the same rules on front-of-pack nutritional labelling across the whole EU – **Strongly agree**

Front-of-pack nutrition information should be displayed on more products – **Don't know**

Front-of-pack nutrition labelling is an appropriate tool to incentivise food businesses to improve the nutritional content of their products – **Don't know**

Health and nutrition claims on food products should only be allowed if they meet some nutritional quality (e.g. levels of salt, sugars,...) – **Strongly agree**

Q2: In your opinion, how likely is each of the following options to encourage consumers to change their food purchasing behaviour?

Information on the amounts of specific nutrients (fat, saturated fat, sugars, salt) and on the energy value in a portion of the food, as well as how much this represents as a percentage of the daily reference intake – **Very unlikely**

Information on the amounts of specific nutrients (fat, saturated fat, sugar, salt) and on the energy value in a portion of the food, as well as how much this represents as a percentage of the daily reference intake. Colours are used to classify those nutrients per 100 g of the product as 'low' (green), 'medium' (amber) or 'high' (red) – **Neutral**

Information on a product's overall nutritional value (based on the integration of both unfavourable elements (sugars, saturated fat, salt and calories) and favourable elements (protein, fibre and content of fruits, vegetables, pulses, nuts and olive /rapeseed/walnut oils)) through a graded indicator that can be applied on all products. Colours and letters are used to classify the overall nutritional value of the product, from 'highest nutritional value' (dark green, A) to 'lower nutritional value' (dark orange, E) – **Likely**

Information on a product's overall nutritional value through a positive (endorsement) logo that can be applied on foods that comply with specific nutritional criteria only. The criteria can be based on e.g. amount of fat, saturated fat, sugars, salt, fibre, wholegrain, fruit and vegetables depending on the food category and the specific label – **Likely**

A combination of the above options: information on the overall nutritional quality of a product combined with information on the content of specific nutrients – **Very likely**

Q3: In your opinion, how likely is each of the following options to encourage businesses to improve the nutritional aspects of their products?

Information on the amounts of specific nutrients (fat, saturated fat, sugars, salt) and on the energy value in a portion of the food, as well as how much this represents as a percentage of the daily reference intake – **Very unlikely**

Information on the amounts of specific nutrients (fat, saturated fat, sugar, salt) and on the energy value in a portion of the food, as well as how much this represents as a percentage of the daily reference intake. Colours are used to classify those nutrients per 100 g of the product as 'low' (green), 'medium' (amber) or 'high' (red) – **Neutral**

Information on a product's overall nutritional value (based on the integration of both unfavourable elements (sugars, saturated fat, salt and calories) and favourable elements (protein, fibre and content of fruits, vegetables, pulses, nuts and olive /rapeseed/walnut oils)) through a graded indicator that can be applied on all products. Colours and letters are used to classify the overall nutritional value of the product, from 'highest nutritional value' (dark green, A) to 'lower nutritional value' (dark orange, E) – **Likely**

Information on a product's overall nutritional value through a positive (endorsement) logo that can be applied on foods that comply with specific nutritional criteria only. The criteria can be based on e.g. amount of fat, saturated fat, sugars, salt, fibre, wholegrain, fruit and vegetables depending on the food category and the specific label – **Likely**

A combination of the above options: information on the overall nutritional quality of a product combined with information on the content of specific nutrients – **Likely**

Q4: If EU rules meant that food product manufacturers could only make health and nutrition claims on foods that met defined nutritional criteria, how likely is the following?

Food businesses whose products **were bearing claims** before the new criteria were introduced, but whose products do not meet the new criteria, will change the recipe of their products to make them healthier so that they **may keep** health and nutrition claims on their products – **Neutral**

Food businesses whose products were not bearing claims before the new criteria were introduced, and whose products do not meet the new criteria, will change the recipe of their products to make them healthier so that they may add health and nutrition claims to their products – **Neutral**

Q5: If you would like to raise other issues pertinent to the issues of front of pack nutrition labelling and the setting of nutrient profiling criteria to restrict claims, please provide details below.

NA

Alcoholic beverage labelling

Q6: To what extent do you agree with the following statements:

A list of ingredients and nutritional information should be provided to consumers for alcoholic beverages as is the case for other foods and beverages – **Strongly agree**

The type of information provided to consumers should be the same for all categories of alcoholic beverages (e.g. beers, wines, spirit drinks,...) – **Strongly agree**

Consumers should have access to the same information for alcoholic beverages across the whole EU – **Strongly agree**

Food businesses should be subject to the same labelling rules for alcoholic beverages across the whole EU – **Strongly agree**

Food business operators voluntarily provide sufficient information to consumers on the ingredients of alcoholic beverages – **Strongly disagree**

Food business operators voluntarily provide sufficient information to consumers on the nutritional content of alcoholic beverages – **Strongly disagree**

Food business operators voluntarily provide sufficient information to consumers on the energy value of beverages – **Strongly disagree**

Q7: How do you think the information on nutritional content and ingredients should be provided to consumers? Please select one option for each information type.

Full nutrition declaration (energy value, fat, saturates, carbohydrate, sugars, protein and salt) – **On-label**

Nutrition declaration only on energy value (Kcal/KJ) – **On-label**

List of ingredients – **On-label**

Q8: If the list of ingredients and the nutrition declaration were provided to consumers off label, accessed using a QR code provided on the label, to what extent do you agree with the following statements:

Consumers have the equipment (mobile phone and internet connection) to access the off-label information through the QR code when buying alcoholic beverages – **Strongly disagree**

Consumers will make use of the off-label information when buying alcoholic beverages – **Strongly disagree**

Consumers pay the same attention to the nutritional declaration and the list of ingredients when they are provided on the label or when it is provided through a QR code – **Strongly disagree**

The provision of information on the nutritional declaration and the list of ingredients via a QR code, redirecting to a website, is as reliable as the provision of the same information on labels – **Strongly disagree**

Additional contributions:

We provided the European Commission with our [Labelling Briefing](#) and our [recent research](#) on the inadequacy of sugar and calorie labelling on wines.