



European Parliament
Mr G.J. Gerbrandy
Wiertzstraat ASP 10G318
1047 Brussels
Belgium

Subject: Concerns on Food Information Proposal of the Joint Dutch stakeholders in the Food Chain

April 11, 2011

Dear Mr Gerbrandy,

It is with utmost urgency that we, **all Dutch stakeholders in the food chain** (see all participating parties and their contact details in annex 2), draw your attention to the upcoming vote in the ENVI committee on the Sommer report on a proposal for a regulation for food information for consumers. We are very much concerned about the possible outcome of the ENVI vote, with respect to **2 main issues** (among others): **origin labelling** and **nutrition declaration**. **These issues are explained briefly below, followed by our general concerns about the proposal.**

1. Origin labelling:

Country of origin labelling should only be mandatory if consumers would be misled when this is omitted (current legislation).

Why are we against mandatory origin labelling?

- Country of origin labelling does not in itself state anything about food safety, food quality or sustainability. Therefore, it is a typical example of 'nice to know' and not of 'need to know'. Furthermore, consumer studies show that Dutch consumers are not interested in the origin of their food, let alone that this influences their buying behaviour.
- The food supply chain is highly complex; therefore country of origin labelling is in many cases **not feasible**. It will lead to both inflexibility in sourcing our raw materials and to frequent label changes. This will inevitably lead to **increased costs** for producers and consumers and it will **hinder innovation**.
- Origin labelling runs **against the principle of free movement of goods** since it is being misused for the protection of national interests. We are one internal market in the EU, and not 27 individual markets. The Netherlands is the second AGRI-food exporter in the world and will therefore be **disproportionally hit by such a measure**.

If an **impact assessment** is to be carried out as a compromise, this should be of sufficient quality and all stakeholders in the food chain should be involved. It should at least take into account the effects on the internal market, the different geographical levels (for instance EU vs non-EU or 'farmed in' vs 'born, raised, slaughtered') and it should pay explicit attention to the costs of origin labelling of food ingredients and components of meals, and of the current provisions for beef and veal ('born, raised, slaughtered').

Nutrition labelling

Nutrition labelling should inform consumers about the nutritional composition of the food. On the other hand, the label is not a replacement of education of the consumer and should therefore not be overloaded with information. In order for the labels to be informative but not too complicated we strongly support the following mix of mandatory and voluntary provisions.

- Mandatory labelling of the **Big 8** (Big 8: energy, protein¹, carbohydrates, of which sugars, fat, of which saturated fat, sodium and fibres), declared **per 100g/100ml** in the **same field of vision**, and **voluntarily additionally per portion**. Declaration **per portion only**, should be **possible** on **single portion packages**.
- **Energy front of pack preferably as GDA per portion** since this is the most important information for consumers. After all, overweight and obesity are the consequences of an imbalance between energy intake and energy expenditure.
- **Trans fat labelling** should be **voluntary** since trans fats in food do not pose a health risk anymore. It is the total intake of trans fats that counts, and this total intake of trans fats in the Netherlands is at the level identified by the Dutch Health Council as being without health risk. Thus, labelling of trans fats does not have any health benefit for the consumer whilst it does create additional cost and administrative burdens.
- **Labelling GDAs (declaration as percentage of)** - other than energy - **should be voluntary and expressed per portion** and not per 100g/ml. GDAs per 100 grams/millilitres do not make sense since we do not eat 100 grams or drink 100 millilitres per consumption moment, but consume portions. The consumer will need a calculator to determine what his intake is compared to the guideline daily amount.
- **No colour coding**. This does not help consumers in making an informed choice (it is only focussed on the negative nutrients and not on the total nutritional value of the product).
- Declaration of **vitamins and minerals** present in basic food groups should be possible. We strongly **support the proposal of the Council** on this issue, but we propose to **add** an option based on **kilocalories**, bringing this provision in line with Codex Alimentarius provisions. See **Annex I** for detailed explanation.

General concern: full and complicated labels are no solution

Consumers are entitled to objective and clear information about their food, in order to enable them to make an informed choice that fits their individual needs. Therefore we support the effort of the Commission, the Council and the European Parliament to **simplify** and further harmonise the labelling provisions.

We are very much concerned about the tendency to 'respond to' all the possible wishes of the consumer and perceived 'problems' by putting additional information on the label. **This is no solution**. If consumers ask for certain information we will provide it to them, by the appropriate means. This does not require mandatory labelling of many items across the board. We ask you therefore urgently to take into account the difference between '**need to know**' and '**nice to know**'. The labels are full enough as it is, and any additional 'nice to know' and unnecessary information will only result in more administrative burdens, higher costs and more unclear and therefore confusing labels.

We urgently **ask you to support us on these issues** and to take the appropriate action/vote accordingly. Please do not hesitate to ask any of the contacts listed in Annex II for additional information or **voting recommendations**.

Sincerely,

All Dutch stakeholders in the food chain

¹ The **protein conversion factor for milk protein** should be **6.38** instead of 6.25, according to the opinion of scientific bodies and in alignment with Codex Alimentarius.

ANNEX I. Our position explained

2 Explanation of significant amount amendment

The significant amount as referred to in annex XIII (point2) of the Council proposal for food information to consumers is the amount of a vitamin/mineral that should be present in the product in order to be able to declare these vitamins/minerals on the label. In the current Council proposal the significant amount is defined as follows:

- 15 % of the nutrient reference values specified in point 1 supplied by 100 g or 100 ml in the case of products other than beverages;
- 7,5 % of the nutrient reference values specified in point 1 supplied by 100 ml in the case of beverages; or
- 15 % of the nutrient reference values specified in point 1 per portion if the package.

This proposal is strongly supported by the Dutch stakeholders. However, it still excludes basic foods such as fruits, vegetables, potatoes, meat, bread and milk from declaring the presence of certain vitamins and minerals, while these basic food groups contribute substantially to our intake of vitamins and minerals. To solve this problem we propose to **add a fourth option**, namely:

- *5% RDA per 100 kcal for solids.*

By adding this option the EU provisions will be aligned with the Codex Alimentarius provisions.

ANNEX II. Contact details of the undersigning organisations.



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Bij de FNLI zijn de volgende branches aangesloten:

- NZO (Nederlandse Zuivel Organisatie)
- BNMF (Bond Nederlandse Margarinefabrikanten)
- NVB (Nederlandse Vereniging voor de Bakkerij)
- Nederlandse Vereniging van Producenten van Ontbijtgranen
- NVS (Nederlandse Vereniging van Soepfabrikanten)
- NVC (Nederlandse Vereniging van Consumptie-ijsfabrikanten)
- Nederlandse Vereniging van Sausfabrikanten
- VBZ (Vereniging voor de Bakkerij en Zoetwarenindustrie)
- AKSV (Algemene Kokswaren-en Snackproducentenvereniging)
- CBK (Centraal Brouwerij Kantoor)



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- FWS (Nederlandse vereniging Frisdranken, Waters, Sappen)
- KNVKT (Koninklijke Nederlandse Vereniging voor Koffie en Thee)
- NEA (Vereniging van Geur-en Smaakstoffenfabrikanten)
- NEBAFA (Vereniging van Nederlandse Fabrikanten van Bakkerijgrondstoffen)
- VIGEF (Vereniging van de Nederlandse Groenten-en Fruitverwerkende Industrie)
- VNFKD (Vereniging van Nederlandse Fabrikanten van Kinder-en Dieetvoedingsmiddelen)
- VNG (Vereniging Nederlandse Glucosefabrieken)
- VRN (Vereniging van Rijstpellers in Nederland)
- OFCA (Organisatie voor fabrikanten van cellulose derivaten)
- VAVI (Vereniging voor de Aardappelverwerkende Industrie)