



EHN views on a nutrient profiles model

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- Developing a nutrient profiling system from scratch is very complicated, thus EHN has suggested that the Commission should a) identify existing models that have been systematically developed and are well validated (e.g. the models developed by the UK Food Standards Agency (FSA), the French Food Standards Agency (AFSSA) or Australia New Zealand Food Standards (FSANZ)) b) select one of those models and, if appropriate, c) modify it for use in connection with the Regulation on nutrition and health claims.
- A nutrient profiling model with fewer categories and more nutrients will classify foods better than the multi-category system proposed by the Commission. (For example the FSANZ model has just three categories: (i) fats, oils and cheeses (ii) other foods and (iii) drinks and involves seven different 'nutrients': energy, saturated fat, totals sugars, sodium, protein, fibre and 'fruit and vegetables' (it has just a few exemptions). The model currently proposed by the Commission - on the other hand - has 15 different categories and 8 different types of food are exempted from the model. It involves just three nutrients: saturated fat, totals sugars and sodium.
- All recent experience in nutrient profiling (in France, the UK, US, etc.) suggests that if nutrient profiling models are to categorise foods in line with food-based dietary guidelines then they need to involve scoring for the levels of nutrients in foods and that they also need to involve a range of different nutrients. Experience suggests that models that use scoring and about five to ten different nutrients require only a few categories simplifying the model for the purposes of enforcement.
- Our analysis of the various Commission models, with several categories and only few nutrients, shows how they compare with other well-validated models that have been developed for the regulation of nutrition and health claims. It shows that it compares unfavourably with existing models. For example, the current Commission proposal categories foods such as doughnuts, pork sausages, and some high sugar breakfast cereals as 'healthy' and thus eligible to make a claim and some sandwiches and some high fibre breakfast cereals as 'unhealthy' and thus ineligible to make a claim.
- EHN has closely watched and analysed the development of the Commission's proposed model. The model has gone through at least four drafts. Each successive draft has been more lenient (allowing more and more foods to make a claim) and also less and less good at classifying foods. It has become more and more complicated with more and more categories and more and more exemptions.
- EHN now suggests that the Commission stops seeking to develop its own model and adopts the model developed by Food Standards Australia New Zealand (FSANZ) for the regulation of health claims.