

## SNE calls for exclusion of specialised nutrition categories from front-of-pack nutrition labelling (FOPNL) schemes and nutrient profiles

The specialised nutrition industry strives to provide tailor-made dietary solutions for people with specific nutritional needs. Specialised Nutrition Europe (SNE) supports the new 'EU Farm to Fork Strategy' and its objective to promote healthier and sustainable diet choices for all. In the current debate on nutritional information, we support science-based policy initiatives that promote healthy diet and help consumers make informed decisions.

However, nutrient profiles and FOPNL schemes for general foods are not suitable for specialised nutrition products because they use calculation methods based on the nutritional needs of a healthy adult population. SNE calls on European policy-makers to guarantee the exclusion of the specialised nutrition category from any FOPNL schemes and nutrient profiles for general foods.



### In a nutshell



Specialised food products are intended for specific populations with specific nutritional needs. Nutrient profiles and FOPNL schemes for general foods use calculation methods based on the nutrition needs of a healthy adult population and are thus not suitable for specialised food products.



SNE calls on the Commission to guarantee the general exclusion of the specialised nutrition category in the drafting of the new FOPNL schemes and nutrient profiles for general foods.

This includes:

- Food for infants and young children
- Food for special medical purposes
- Sport food
- Food for weight loss and weight control



SNE calls on policy-makers to engage with the Commission and to ensure that this exclusion is guaranteed and safeguarded.

## Why exclude specialised nutrition products from the new FOPNL/nutrient profile regulation?

Specialised Nutrition Europe supports the objective of a harmonised front-of-pack nutrition labelling system and nutrient profiles at EU level to provide consumers with the information they seek in order to make informed choices based on their needs as part of a healthy and balanced diet.

However, nutrient profiles and FOPNL schemes for general foods are not suitable for specialised nutrition categories<sup>1</sup> because they use calculation methods based on the nutritional needs of a healthy adult population. Specialised food products are intended for specific populations with specific nutritional needs (babies, sportspeople, patients, overweight & obese people) and most of them are governed by distinct EU rules framing their nutritional composition and/or the use of nutrition and health claims.

Applying FOPNL schemes and nutrient profiles on specialised nutrition foods would mislead consumers from specific populations and prevent them from making informed choices adapted to their nutritional needs, as well as unjustifiably discriminate against these categories. Voluntary FOPNL schemes, such as Nutri-Score, recognise their inadequacy for specialised nutrition categories<sup>2</sup>.

### What are the nutritional differences in specialised foods?



#### Infant and young children food<sup>3</sup>

Infant and young children have different nutritional needs than older children and adults. Infant and young children food are designed to meet these specific nutritional needs to ensure healthy growth and development. For example, infants and young children need to eat proportionally more fat than adults, as fat helps develop their immune systems and absorb vitamins. A general FOPNL scheme based on adults' nutritional needs would give the perception that infant nutrition products are high

in fat and would mislead parents and lead them to choose inappropriate or unhealthy alternatives.

The composition of infant and young children nutrition products is already regulated at EU level on the basis of the latest scientific developments<sup>4</sup>. Therefore, nutritional labelling schemes and nutrient profiles that aim to guide consumer behaviour towards healthier alternatives are not appropriate in this framework.

1 This includes: infant and young children foods (including Young Child Formula), food for special medical purposes, sports foods and foods for weight loss and weight control

2 For example, the French Guidelines do not recommend using Nutri-Score for the following categories: food for specific groups (infant and follow-on formula, baby food, food for special medical purpose and total diet replacements), other food for young children, sport food and meal replacement.

3 This includes infant formula, follow-on formula, young child formula, processed cereal-based food and baby food.

4 Delegated Regulation (EU) 2016/127 supplementing Regulation (EU) No 609/2013 of the European Parliament and of the Council as regards the specific compositional and information requirements for infant formula and follow-on formula and as regards requirements on information relating to infant and young child feeding and Directive 2006/125/EC on processed cereal-based foods and baby foods for infants and young children



## Food for special medical purposes

Foods for special medical purposes (FSMPs) are designed to meet the specific nutritional or dietary needs arising from a wide range of medical conditions that affect patients of all ages. Consequently, their composition may differ substantially from general food. They are used under the supervision of a healthcare professional to support nutritional intervention on patients with diverse nutritional challenges, e.g.

renal disease, head and neck cancer, cystic fibrosis, intestinal failure, metabolic disorder, etc.

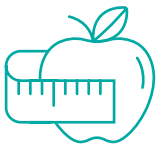
A general FOPNL scheme applicable to FSMPs would be confusing and misleading to healthcare professionals and patients, resulting in a potential deterioration of care through suboptimal nutritional support.



## Sport food

Sports people have nutritional needs that differ from the general adult population. These nutritional needs, such as higher requirements for carbohydrates, sugar and salt, are recognised by the European Food Safety Authority (EFSA) and the European Commission<sup>5</sup>. For example, carbohydrates contribute to muscle recovery

and endurance. The application of nutrient profiles to sport foods would prevent the use of relevant health and nutritional claims on these products and mislead consumers in terms of the role that sport food plays in meeting their specific nutritional needs before, during, and after physical activity.



## Foods for weight loss and weight control

Foods specifically intended for weight loss and weight control are ready-to-use or easy-to-prepare food products containing a limited amount of calories packed with essential nutrients that can be used to replace one or two meals per day, or the whole diet. They aim to help manage body weight in a safe and efficient manner. They are specially formulated and manufactured to respond to the particular dietary

needs of certain groups of consumers, such as those who are overweight or obese, and are often used with the help of a healthcare professional.

A general FOPNL scheme applicable to slimming foods would mislead consumers on the specific nutrition requirements that are linked to a restricted calorie intake diet.

<sup>5</sup> Study on food intended for Sportspeople, European Commission, Director General for Health and Food Safety, June 2015: [https://ec.europa.eu/food/system/files/2016-10/fs\\_labelling-nutrition\\_special\\_study.pdf](https://ec.europa.eu/food/system/files/2016-10/fs_labelling-nutrition_special_study.pdf)

## About SNE

SNE is the voice of the specialised nutrition industry in Europe. Foods covered by the specialised nutrition sector are tailor-made dietary solutions for populations with very specific nutritional needs including infants & young children, patients under medical supervision, sportspeople, overweight and obese consumers, and those suffering from coeliac disease.

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