

ENSA Position on the Revision of the EU Food Information to Consumers Regulation

3 February 2021

ENSA welcomes the intention of the European Commission to revise Regulation (EU) No 1169/2011 on the provision of food information to consumers (FIC Regulation), and trusts it will help deliver on the commitment of the EU Farm to Fork Strategy to encourage consumers to adopt healthier and more sustainable eating habits, including more plant-based foods.

We support policy measures aimed at nudging consumers into healthier food choices. Healthy and sustainable options should be made more affordable, continuously more appealing and ought to be supported by policy measures – including information and labelling requirements – that allow consumers to easily distinguish the healthier, more sustainable option.

Depending on the market in which our members are operating, some will already be using voluntary interpretative front-of-pack labelling. Irrespective of the type of nutritional label, as producers of plant-based foods which are used as alternatives to meat and to dairy products, we strongly support labelling schemes that **allow consumers to compare between products which are used in the same way and at similar consumption moments**, to enable them to make informed choices between two or more options. The nutrient profiling system on which these labels are based should therefore treat animal-based and plant-based products equally. The specificities of plant-based products have been recognised in the French Nutri-score model for instance, where the same algorithm to calculate the score is used for both dairy-based drinks and plant-based drinks (both considered to be closer to food).

More generally, front-of-pack nutrition labelling should be based on science, cover all foods including single ingredient products and reflect national dietary guidelines such as 'Wheel of Five' in the Netherlands.

When assessing the policy options considered in the Inception Impact Assessment, we urge you to take the characteristics of plant-based products into account, to allow consumers to compare the nutritional quality of food and beverages at a glance and enable them to make better food choices. The Farm to Fork strategy acknowledges the health and sustainability benefits of moving to a more plant-based diet, and we trust that forthcoming proposals will be in coherence with it.

About ENSA

The European Plant-based Foods Association (ENSA) represents the interests of plant-based food manufacturers in Europe. ENSA is an association of internationally operating companies, ranging from large corporations to small, family-owned businesses with a combined annual turnover of over €1 billion. ENSA members produce high-quality plant-based alternatives to dairy and meat products. Since its establishment in 2003, ENSA has been raising awareness about the role of plant-based diet in moving towards more sustainable and healthier food consumption patterns.