

Nutrient Profiles

POSITION PAPER



The European Snacks Association (ESA)¹ fully supports the ambitions of the Farm to Fork Strategy to deliver sustainable food production and consumption and to help achieving the EU's Green Deal objectives towards climate-neutrality in Europe.

In May 2020, the European Commission adopted the [Farm to Fork Strategy](#), aiming to make food systems fair, healthy and environmentally friendly. In this context, the Commission is proposing a revision of [Regulation \(EU\) No 1169/2011](#) on the provision of food information to consumers and the establishment of nutrient profiles to restrict the promotion (via nutrition or health claims) of foods high in fat, sugars and salt. The Regulation (EU) No 1169/2011 already provides a high degree of product transparency in respect of energy content and nutrient content of carbohydrates, sugar, fat, saturated fatty acids, protein, and salt. The consumer is simultaneously being offered complete information as a point of orientation, not only Back-of-Pack (BOP) but also Front-of-Pack (FOP). **The European savoury snacks industry has been at the forefront of voluntarily providing consumers with clear nutrition information (GDAs, now Reference Intakes) FOP and fully supports a voluntary, science-based, non-discriminatory and informative labelling of food products.**

According to art 4 (1) of Claims Regulation², nutrient profiles are thresholds of nutrients such as fat, saturated fat, salt and sugars above which nutrition claims are restricted and health claims are prohibited. **In our opinion, nutrient profiles should not exclude any products a priori, i.e. not discriminate against specific foods or ingredients and be used in the context of the Claims Regulation only.** Nutrient profiles should

be established based on science and evidence and should only be set following a holistic impact assessment. Nutrient profiles should only relate to diet, nutrition and the relation to health, and not to food safety which is regulated elsewhere in EU legislation. Moreover, it is also essential that nutrient profiles are **not used in any other fields, such as marketing or taxation, in order to avoid potential discrimination of products.**

Our recommendations

Nutrient profiles should:

- 1 not exclude any products a priori, i.e. not discriminate against specific foods or ingredients, and be used in the context of the Claims Regulation only.
- 2 be developed for all categories; as all categories can provide options ranging from nutritious to indulgent.
- 3 be established based on science and evidence and should only be set following a holistic impact assessment.
- 4 not be used in any other fields, such as marketing or taxation, in order to avoid potential discrimination of products.
- 5 take into account positive nutrition. In particular, potatoes should continue to classify as contributing to vegetable content.
- 6 be conducive and incentivise reformulation and future innovation.

¹ ESA is Europe's only trade organisation dedicated to advancing the savoury snacks industry on behalf of member snack manufacturers and suppliers, as well as national trade organisations. ESA members are involved in the manufacture of potato crisps, corn chips /tortillas, pellet snacks, baked snacks, crackers, pretzels, savoury biscuits, popcorn, pork rinds, meat snacks, fruit snacks, peanuts, other snack nuts and various other savoury snacks in this category.

² Regulation (EC) No 1924/2006 of the European Parliament and of the Council of 20 December 2006 on nutrition and health claims made on foods

Savoury snacks can be part of a healthy and balanced diet

All savoury snack products contain core nutrients (carbohydrate, fat, protein), micronutrients in the form of minerals, vitamins, and fibre, and offer a quick source of energy. Among which:

Pulse-based snacks, for example lentils-based snacks, have on average 40% less fat than regular potato crisps and a 13% protein content.

Nuts are an important source of nutrients, including dietary fibre, copper, iron, magnesium, and potassium. They also contain many important minerals and vitamins, with their own benefits and varying levels of nutrients. For instance,

- **Almonds** are a 'high source' of dietary fibre and vitamin E, the latter which contributes to the protection of cells from oxidative stress. They are also high in riboflavin (vitamin B2), which contributes to the maintenance of normal skin and vision, and calcium, which helps maintain normal bones and teeth.
- **Cashews** are high in copper and iron, which contribute to the normal functioning of the immune system.

Savoury snacks products contribute very little to the average dietary salt and fat intake in the European diet, taking also into account that they are usually eaten in small quantities. **According to the latest figures in the EU³, only 3% of the average overall dietary intake of salt derives from savoury snacks.** To further improve the nutritional composition of products and meet consumer preferences, where possible, snacks makers also increasingly include fibre- and protein-rich ingredients such as pulses to develop the market for healthier options.

As a priority for the snack industry, accurate labelling helps consumers make informed choices providing information on a wide variety of issues including ingredient composition, nutritional value, portion sizes and storage conditions⁴.

Innovation has always been at the heart of the European savoury snacks industry

ESA members constantly invest in the reformulation of existing products as well as in the development of new products, ingredients and manufacturing methods to bring great flavours and tastes to market whilst ensuring lower levels of salt, saturated fat and total fat. However, it is extremely challenging to continue changing product recipes at this pace without considering what has been already achieved. In terms of salt and fat reduction, the industry is reaching its technological limits and further reducing these nutrients might mean that some products simply cannot be manufactured anymore (e.g. baked or extruded products) or organoleptic properties might alter so much that consumers will stop purchasing products with an improved nutritional composition.

It is important that nutrient profiles do not stifle the ability of the food and drink industry to innovate or reformulate – whether this is to make small but meaningful positive contributions, or equally affect other positive nutritional contributors. Communicating nutritional changes made on foods is a form of nutrition claim and if nutrient profiles are too restrictive, advising consumers about such beneficial changes could be impacted, which in turn impacts the overall health of consumers' diets in a negative way.

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³ Euromonitor Nutrition Passport 2019.

⁴ [ESA Consumer Information Factsheet](#)