

Nutrient profiles for foods bearing claims

Fields marked with * are mandatory.

Background

Regulation (EC) 1924/2006 (Nutrition and Health Claims – NHC Regulation) establishes EU rules on nutrition and health claims made on foods. Food business operators need to follow these rules when they want to highlight the nutritional or health benefits of their products through claims made on the product label or in its advertising. The rules apply to: nutrition claims, such as "low fat", "high fibre", or in the form of logos and symbols (e.g. Nordic keyhole); and, to health claims, such as "Vitamin D is needed for the normal growth and development of bone in children".

The NHC Regulation planned for the level of certain nutrients contained in food to be a condition for allowing these foods to make nutrition and health claims. To this end, so-called 'nutrient profiles', would define maximum levels of certain nutrients such as fat, saturated fat, salt, and/or sugar above which nutrition claims would be restricted and health claims would be prohibited. The objective has been to avoid a situation where a claim would mask the overall nutritional image of a food product, which could mislead consumers when trying to make healthy choices in the context of a balanced diet. 'Nutrient profiles' are to be set at EU level, to ensure that the same rules apply throughout the Union. However, due to the complexity of the subsequent discussions, the EU nutrient profiles have not been set to date.

What is this survey about?

The Commission is currently evaluating the issue of nutrient profiles, and in particular will be looking into whether nutrient profiles are still fit for their purpose or if any alternative can be envisaged to reach the same objectives.

This consultation is an opportunity for your company to influence any possible changes to the legislation on nutrition and health claims made on food under the NHC Regulation).

This consultation aims at finding out how Regulation (EC) 1924/2006 (EU rules on the use of nutrition and health claims) affects smaller businesses in the sector.

The Commission is keen to hear from SMEs about their experiences – good and bad – on the current situation and how they are complying with the rules.

SMEs feedback will help the Commission assess the effectiveness of the law, and possibly make changes to it.

Enterprise Europe Network Partner identification

* Please enter your 7 digit EEN partner code:

Text of 7 to 7 characters will be accepted

You find it next to your name in Merlin forums. Example: BE00268

SME panel questionnaire: general respondent profile

1. Does your company manufacture and/or trade in food products that make nutrition and/or health claims? (please tick all that apply)

	Yes	No
nutrition claims in text, e.g. 'low fat', 'high fibre' etc.	<input type="radio"/>	<input type="radio"/>
nutrition claims in pictures or images, e.g. keyhole logo	<input type="radio"/>	<input type="radio"/>
health claims, e.g. 'Vitamin D is needed for the normal growth and development of bone in children' etc.	<input type="radio"/>	<input type="radio"/>

IF ANSWER IS 'NO' TO ALL QUESTIONS, QUESTIONNAIRE STOPS HERE

2. In which of the following sectors is your company mainly active? (please tick all that apply)

- Vegetable oils and spreadable fats
- Cheese
- Other dairy products
- Breakfast cereals/cereal bars
- Other cereals and cereal products (including potatoes and starchy roots)
- Meat and meat products
- Fish and fish products
- Vegetables and their products
- Fruit and their products
- Beverages (non-alcoholic), including tea/coffee, soft drinks etc.
- Sports nutrition
- Other food and drink products

Please specify other food and drink products

3. In which country is your company established?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom

4. What is the size of your company?

- self-employed
- 1-9
- 10-49
- 50-249
- ≥ 250

5. Which of the following markets does your company mainly trade in? (please tick all that apply)

	Yes	No
National market	<input type="radio"/>	<input type="radio"/>
EU/EEA market	<input type="radio"/>	<input type="radio"/>
Markets outside the EU/EEA	<input type="radio"/>	<input type="radio"/>

Below we ask some questions relating to the content of fat, saturated fat, sugar, and/or salt in food products making nutrition and/or health claims. We use the abbreviation 'FSS' for these nutrients.

6. Approximately, what percentage (%) of your total sales value is represented by food products making nutrition and/or health claims?

- less than 10%
- 11-25%
- 26-50%
- 51-75%
- 76% and more

7. Since 2007, have you changed (reduced or increased) the FSS nutrient content in your food products making nutrition and/or health claims?

	Increased	Reduced	No change
Fat	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Saturated fat	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sugar	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Salt	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

8. Have you changed the FSS nutrient content in your food products making nutrition and/or health claims, because of any of the following considerations? (You may choose 'not applicable' if there has been no change to the level of any of the FSS nutrients in any of your food products making claims.)

	Yes	No	Not applicable	Do not know
The mandatory nutrition declaration on the product's pack	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Any national rules/schemes concerning content of FSS nutrients? (e.g. rules on front of pack nutrition labelling, advertising to children, reformulation, food taxes etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Any private or industry initiatives concerning the content of FSS nutrients (e.g. initiatives on front of pack nutrition labelling, advertising to children, reformulation etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Market trends/ consumer demand for 'healthier' products/ competitors' offer of 'healthier' products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Any other considerations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other considerations (please specify):

9. Do you currently sell any food products that make nutrition and/or health claims and could potentially be considered high in at least one of the FSS nutrients?

	Yes	No	Don't know
Fat	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Saturated fat	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sugar	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Salt	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10. Approximately, what percentage of your sales value of food products making nutrition and/or health claims is represented by products potentially high in FSS content?

- less than 10%
- 11-25%
- 26-50%
- 51-75%
- 76% and more
- Don't know

11. Are you currently facing any problems when placing your food products making nutrition and /or health claims on the market because of their level of FSS nutrients, due to a rule developed by national authorities or by industry initiatives?

	Yes	No	Do not know /no opinion
Problems, in the national market (country where my company is based)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Problems, in other markets in the EU (other EU countries)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you are currently facing problems/restrictions, please provide an example of a rule that cause you problems/restrictions, and any further details of how these rules affect your business activities:

12. Do you think some limits in FSS nutrient content need to be set for food products making nutrition and/or health claims:

	Yes	No	Don't know
Across the EU (harmonised at EU level)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
At national level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Across product categories	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
For specific product categories	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

13. If limits were to be set on FSS nutrient content in foods making nutrition and/or health claims, would you need to take any of the following actions to comply with the limits?

	Probably yes	Probably not	Don't know
Reformulate to change content in FSS nutrients to below the limit, so that products can keep claims	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Withdraw/remove claims on products with nutrient content above the limits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Change product range	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What would be the approximate costs and/or losses of any actions you may need to take?

Please indicate the type of costs/losses, estimated amount and reasons why they would occur.

14. If such limits were set at EU level, how would they impact your business in terms of the following aspects?

	Improved	No impact	Worsened	Don't know
Attractiveness of your products to consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Trading opportunities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Potential to develop new products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ability to comply with rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other aspects of your business	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify 'Other aspects of your business'