

# EUROPEAN ECONOMIC AREA

## STANDING COMMITTEE OF THE EFTA STATES

Ref. 22-2988

16 November 2022

### SUBCOMMITTEE I FREE MOVEMENT OF GOODS

#### EEA EFTA Comment

#### on a harmonised front-of-pack nutrition label

#### 1. EXECUTIVE SUMMARY

- *The EEA EFTA States support the development of a harmonised front-of-pack nutrition label as a part of the upcoming revision of the EU rules on food information to consumers.*
- *The EEA EFTA States make reference to the letter submitted by the Nordic Ministers in June 2022 and emphasise that such a harmonised nutrition label must be evidence based, built on scientific knowledge, available dietary recommendations from different countries, such as the Nordic Nutrition Recommendations (NNR), and be able to solve national dietary challenges in the Member State.*
- *The EEA EFTA States would like to propose a joint expert meeting with the Commission services to share experiences from the existing labelling scheme and relevant nutrition data.*

#### 2. GENERAL REMARKS

1. The EEA Agreement extends the Internal Market to the EEA EFTA States (Iceland, Liechtenstein and Norway). Legislation in the food chain area is an extensive part of the EEA Agreement.
2. The EEA EFTA States wish to continue as constructive partners in the EU regulatory processes regarding EEA-relevant legislation under the Farm to Fork Strategy, as expressed in their Comment on the Strategy from 3 March 2021. They therefore welcome the initiative taken by the European Commission to develop a new harmonised front-of-pack nutrition label (FOPNL).

3. The EEA EFTA States face the same public health challenges as the European Union (EU) with a high prevalence of diet-related diseases and associated healthcare costs. These challenges call for action and show the need for evidence-based and trustworthy guidance for our citizens. The EEA EFTA States are committed to enabling healthy diets for everyone and believe that front-of-pack nutrition labelling schemes can make it easier for consumers to make informed choices and improve their diets. They would therefore like to confirm their commitment to participate in a constructive and transparent dialogue and to actively contribute to the process of developing a harmonised front-of-pack nutrition label within the EEA.

### **3. 3. SPECIFIC REMARKS**

#### **3.1. Science-based labelling scheme**

4. To ensure the effectiveness and credibility of the new front-of-pack nutrition label the EEA EFTA States would like to emphasise the importance of participatory and open dialogue based on the latest scientific evidence and thorough impact assessments. The EEA EFTA States believe that the labelling scheme should be based on nutritional recommendations, documented dietary differences and current dietary challenges in different countries. Furthermore, it should not be influenced by commercial interests. These aspects are important to consider in order to ensure the effectiveness and credibility of a new front-of-pack nutrition label.
5. The EEA EFTA States also want to acknowledge the guiding principles and framework manual for front-of-pack labelling for promoting healthy diets from the World Health Organisation (WHO) and the guidelines on nutritional labelling from the Codex Alimentarius. The EEA EFTA States believe that these are important building blocks to ensure that a harmonised front-of-pack nutrition label will not be detrimental to the long-standing nutrition policies in the EEA.

#### **3.2. Experience from the EEA EFTA States**

6. The EEA EFTA States, Iceland and Norway, have a long history of close multilateral collaboration on nutrition recommendations and nutritional labelling within the Nordic Council of Ministers. The EEA EFTA States, along with their partners in the Nordic Council of Ministers, can contribute with valuable experiences and lessons learned from the Keyhole label, which was introduced already in 1989. The Keyhole label is used today in Iceland and Norway, as well as in Denmark, Lithuania and Sweden.
7. The Keyhole label is a voluntary label that is available for companies that produce products in accordance with the respective criteria. The label has been well received by both consumers and producers in the Nordic Countries and surveys show that the label is regularly used and that it has a high level of trust among consumers, which has been crucial for the success of the label. The EEA EFTA States believe that the key reasons for this high level of trust are that the label is based on scientific evidence, is government-led with relevant stakeholder involvement, is easy to understand and is well known.

8. The EEA EFTA States also collaborate with the other Nordic Countries on the Nordic Nutrition Recommendations (NNR)<sup>1</sup>, which constitute the scientific basis for national nutrient recommendations and food-based dietary guidelines, as well as providing the basis for the Keyhole label. The EEA EFTA States believe that the NNR can be a valuable input into the discussions on the criteria underlying the new front-of-pack nutrition label. The sixth edition of these recommendations will be published in June 2023.
9. The EEA EFTA States hope to contribute positively to the development and discussions of a harmonised front-of-pack nutrition label which is based on scientific evidence and available nutrition recommendations. The EEA EFTA States would like to propose a joint expert meeting with the Commission services to share their experiences from the existing labelling schemes and relevant nutrition data.

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<sup>1</sup> Source: [Nordic Nutrition Recommendations 2022: join in the work \(norden.org\)](https://norden.org)