



**ENSA – EUVEPRO JOINT POSITION PAPER ON THE NUTRIENT PROFILES PRODUCT CATEGORIES  
in the context of the EC Regulation 1924/2006  
– JUNE 2007–**

Article 4 of Regulation 1924/2006/EC on nutrition and health claims made on food establishes the principle of nutrient profiling. Nutrient profiles are meant to **establish the conditions for use for nutrition & health claims for foods and categories of foods.**

- A **product category approach** is more acceptable, since from a nutritional point of view it does not make much sense to apply one set of nutrient profiles for all foods.
- **Definition of product categories: Criteria & rationale:**

The product categories for nutrient profiling should be set on the basis of the role in the diet, meaning **use** (consumption) and **eating moments** taking into account general dietary guidelines, and not on the basis of origin.

From a consumer point of view, food products which are used in the same way (i.e. "source of protein") at the same eating or consumption moments should be classified under the same category (irrespective of their animal or vegetable origin).

The case of soy food products shows that this is the only reasonable course of action: soy drinks can be used as an alternative to dairy milk; soy cream type products can be used as an alternative to dairy cream; soy based yoghurt type products can be used as an alternative to dairy yoghurt, soy-based meat replacers can be used instead of meat.

The nutrient profile categories should not be discriminatory.

**The consumer should be able to make informed choices between these types of products, not in function of their origin (animal/vegetable), but in function of their role in the diet:**

- Product categories based on "origin" are not acceptable, for two main reasons:
  - The essential objective of nutrient profiling is to **facilitate healthier choices**. From a consumer point of view it does not make sense to compare products solely on the basis of their origin: the consumer needs to be enabled to better choose among products that he would choose to eat at different eating moments in a normal daily diet, for instance, for breakfast, or as a dessert etc, independently of the origin of a product (e.g. whether it is an animal or a vegetable based product). In a daily diet the human body needs proteins, sugars, fats, vitamins and minerals and liquids. All these essential nutritional elements can come from different sources (irrespective of vegetable or animal origin).

In addition, **mixed animal/vegetable products** on the market make a **classification based upon origin irrelevant**, for instance dairy products containing soy protein and other soy components; dairy meat replacers (without meat); dairy cream with vegetable fat, etc.



- The other important objective of nutrient profiling is to **stimulate innovation** in the food supply, i.e. to provide incentives for the formulation of 'healthier' food products. This is better achieved by broadening, rather than restricting, the basis on which food manufacturers compete.

**Therefore EUVEPRO and ENSA clearly take the position that all the different soy based products (substitutes) should be classified under the resp. categories of dairy, cheese and processed meat:**

- **dairy and dairy based products plus substitutes (excl. cheeses and dairy spreads); dairy based drinks, desserts, yoghurt, cream and substitutes;**
  - **cheese, cheese products and substitutes (including cheese spreads);**
  - **processed meat, poultry, fish (including meat substitutes).**
- **Proposed classification system based on the Euro Food Classification:**

The Euro Food classification system has been evaluated by EFCOSUM group. In the publication (European Journal of clinical nutrition 2002 56 suppl. 2) of the EFCOSUM group it is stated clearly that "it is essential to review these definitions as some questions remain e.g. the place of substitute flours and starches, soymilk, potato crisps".

Consequently it is clear that one is aware that this classification is **not complete** and needs to be revised and completed.

Soy products are not mentioned (soy based drinks, soy based desserts, soy based yoghurt type products, soy based meat replacers, etc). Under "fruit juices, soft drinks and bottled water" we find "imitation milk products" under "Non alcoholic beverages" (non milk beverages (e.g. carbonated soft drinks, water) etc.

Soy drinks are nutritionally clearly different from soft drinks because they are source of protein whilst soft drinks are a source of sugars (different "use" and "eating moments").

The Euro Food classification system is based on the customs codes (tarif. item numbers).

The customs classification is an economic classification and has nothing to do with nutrition.

The customs classification does not take into account the nutritional value of a food or the role of a food in the diet.

**Therefore EUVEPRO and ENSA are of the opinion that this Euro Food Classification system is no basis for discussion on the definition of nutrient profiles.**



## CONTACT

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