

To whom it may concern,

17 February 2017

Letter regarding the Public Consultation on the study supporting the evaluation of Regulation (EC) No 1924/2006 on nutrition and health claims made on food with regard to nutrient profiles

As Executive Director of World Cancer Research Fund International I am writing to express my concern about the proposition to withdraw the existing provision for setting nutrient profiles at the EU level from Regulation (EC)1924/2006 on nutrition and health claims made of food (Claims Regulation). I am writing to you directly to outline our general comments on why **we believe it is vital to set nutrient profiles at EU level**.

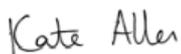
World Cancer Research Fund International is the world's leading authority on the link between diet, weight, physical activity and cancer. Through our Continuous Update Project (CUP)¹ we analyse global research on how diet, nutrition, physical activity and weight affect cancer risk and survival. We have found strong evidence linking overweight & obesity to an increased risk of 11 cancers.

Eating a healthy diet is important for preventing overweight, obesity and nutrition-related non-communicable diseases. Nutrition and health claims provide consumers with information about the nutritional and health advantages of particular foods, and may encourage consumers to make choices that influence their food intake. **Companies also use health claims as a marketing technique to influence consumer choices.** It is therefore essential that the health of EU citizens is protected - **nutrition and health claims must not be presented in a misleading manner and must not mask the overall nutritional status of a food product.** Establishing a nutrient profile model, as required by the Claims Regulation, will help ensure nutrition and health claims align with public health objectives in a way that is clear and transparent. Developing a pan-European nutrient profile model is possible, as evidenced by the model developed by the WHO Regional Office for Europe.²

EU Regulation 1169/2011 on the provision of food information to consumers (in effect since 13 December 2016) requires most pre-packaged foods to provide a nutrition declaration. This regulation does not diminish the need for nutrition and health claims to be regulated using a nutrient profile model. Other countries have set rules on nutrition and health claims, including Australia, New Zealand, Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua, Indonesia, Malaysia, South Africa, South Korea and the United States. Our NOURISHING policy framework and accompanying online policy database³ outline the details of these policies and highlight all the areas where governments need to take action.

We therefore express our strong support for the existing provision for setting nutrient profiles at EU level to remain in Regulation (EC) 1924/2006. Setting nutrient profiles at EU level continue to be relevant, necessary and feasible. We therefore recommend that the EC begin the process immediately to establish the nutrient profiles required by the Claims Regulation.

Yours sincerely,



Dr. Kate Allen
Executive Director, Science and Public Affairs

¹ www.wcrf.org/CUP

² http://www.euro.who.int/__data/assets/pdf_file/0005/270716/Europe-nutrient-profile-model-2015-en.pdf?ua=1

³ www.wcrf.org/NOURISHING