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Prepared By: Sophie Bolla

Approved By: Bruce Zanin

Report Highlights:

On May 20, 2020, the European Commission announced the publication of its Farm to Fork (F2F) Strategy, which contains a roadmap for enhancing food and agricultural sustainability by 2030 under the EU Green Deal. The Strategy marks the beginning of a process aiming to fundamentally change the way EU agriculture operates and food is produced for, and provided to, EU consumers. Within the F2F Strategy, the Commission announced several measures for labeling. These measures are controversial among some EU Member States and include EU-harmonized mandatory front-of-pack nutrition labeling and the extension of origin indication for certain products. The Strategy is not legislative. F2F objectives will need to be converted into legislative proposals, and the European Parliament and Member States will shape and amend these proposals as part of the EU legislative process. This multi-step legislative development process and negotiations between EU institutions typically takes several years to complete.

General Information:

On May 20, 2020, the European Commission announced the publication of the [Farm to Fork Strategy](#) (F2F). The Strategy is a roadmap that will guide EU legislative initiatives and policy making for the duration of Commission President Ursula von der Leyen's tenure (2019- 2024). Ursula von der Leyen has prioritized her Presidency around greening and transforming the EU economy to become carbon neutral by 2050 through the politically ambitious "[EU Green Deal](#)." Throughout 2020, the European Commission is publishing many sectoral strategies with proposed measures to help achieve that goal. The F2F Strategy aims to support the Green Deal by fundamentally changing the way agriculture operates and how food is produced for, and provided to, EU consumers. This report delves into the new food and beverage labeling initiatives, but for more general information about the F2F Strategy and other agricultural and food initiatives proposed by the Commission, please see GAIN Report: *Green Deal Strategies for the EU Agri-Food Sector Presents an Ambitious Policy Roadmap Through 2024*, for more details.

The release of the F2F Strategy marks the beginning of a multi-year legislative development and negotiation process which includes the EU co-legislators: the European Parliament and the Council (EU Members States), as well as citizens, businesses and non-governmental organization stakeholders. In the coming months and years, the Commission will work to convert the objectives of the Strategy into legislative proposals. The European Parliament and the Council will shape and amend these legislative proposals as part of the EU legislative process, before they may become EU law.

The Commission has stated that its key approach to achieving the goals of the F2F Strategy is to support EU consumers in making informed decisions when buying food. In this vein, the Commission announced several labeling measures it intends to pursue that would have an impact on food and beverage labeling legislation in the EU. Currently, the [Food Information to Consumers \(FIC\) Regulation](#) is the main labeling legislation. Information on the current rules governing food labeling at the EU level can be found in the [2020 EU-28 FAIRS Report](#).

F2F and Labelling Initiatives

The F2F Strategy foresees the publication of six proposals that, if they were to become legislation, would impact food and beverage labeling requirements in the EU. The Commission's F2F Strategy relays that most of the proposed measures below will be released for consideration in 2022. Once the drafts are released, they will need to go through the full legislative process, including discussions with the Parliament and Council. Details of the F2F labeling proposals are relayed below.

Mandatory front-of-pack nutrition labeling

The European Commission identifies the empowerment of consumers to make “informed, healthy and sustainable food choices” as a priority. To that end, the Commission announced that it would propose EU-harmonized mandatory front-of-pack nutrition labeling before the end of 2022. Their decision is supported by an awaited [Commission report](#), released in conjunction with the F2F Strategy, regarding the use of additional forms of nutrition information presentation. The Commission’s report notes that front-of-pack labeling has the potential to help consumers make health-conscious food choices and that harmonized mandatory front-of-pack nutrition labeling at the EU-level could help inform these decisions. While the French NutriScore labeling scheme (see below) had been presented in the media as the scheme that would be chosen, Health and Food Safety Commissioner Kyriakides underlined that, at this stage, the Commission would not be recommending any specific schemes, but will first launch an impact assessment on the different options and solicit input from stakeholders through a public consultation.

Currently, according to the Food Information to Consumer Regulation, the nutrition declaration is mandatory on all food products. Detailed rules on the presentation of the nutrition declaration are set out in [Annex XV](#) of the Regulation. The FIC also allows EU Member States to recommend the use of additional forms of expression or presentation of the nutrition declaration, such as front-of-pack labeling. So far, seven Member States have adopted additional front-of-pack nutritional labeling schemes: Sweden and Denmark with the [Keyhole system](#) and France, Belgium, Spain, The Netherlands and Germany with [the Nutri-Score](#) system. The latter has also been adopted by leading food manufacturers such as Nestlé and Danone. However, some Member States, such as Italy, have been [vocal](#) in the past against mandatory front-of-pack labeling. The Italian government is worried that front-of-pack labeling unfairly discriminates against traditional Mediterranean food such as olive oil, ham and cheeses. Italy presented an alternative plan for a new nutrition labeling scheme in January 2020: the [NutrInform](#). This multitude of national schemes already put in place may create tensions among Member States when having to decide on a EU-wide harmonized approach.

Extension of country of origin indication for certain products

The Commission also announced that it will “consider proposing the extension of mandatory origin or provenance indications to certain products, while fully taking into account impacts on the single market¹” before the end of 2022.

Currently, origin labeling is already mandatory in the EU for honey, fruits and vegetables, olive oil, fishery and aquaculture products as well as fresh, chilled and frozen beef, pork, sheep and goat meat and poultry. However, it is still possible for EU Member States to introduce, under certain conditions, national mandatory origin rules. As a result, some Member States, such as France, Italy and Portugal, have decided to introduce mandatory country of origin labeling for certain products, mostly milk and milk products. According to a 2015 [Eurobarometer survey](#),² a large majority of Europeans citizens (84 percent) say it is necessary to be able to identify the place of origin of milk. This number increases to 88 percent for meat. In the past when Member States introduced origin pilots in

¹ The “Single Market” refers to the EU as one territory without any internal borders or other regulatory obstacles to the free movement of goods, people, and services.

² A Eurobarometer survey is an opinion survey conducted regularly on behalf of the European Commission. These surveys address a wide variety of topical issues relating to the European Union throughout its Member States. The Eurobarometer results are published by the European Commission's Directorate-General for Communication.

their countries, Member States expressed concern that this gastro-nationalism increases production costs and undermines the EU's single market. [EU industry groups](#) and EU trading partners had also expressed concern about the impact of these different rules on the EU Single Market. The impacts of national origin labeling schemes are also causing divisions among Member States.

USDA FAS reporting on prior EU and EU Member State origin labeling initiatives:

- [GAIN Report - EU Agriculture Ministers Divided over National Country of Origin Labeling \(COOL\) Measures](#)
- [GAIN Report - Commission Briefing on New Origin Labeling Rules](#)

Sustainable food labeling framework

The Commission announced that it will “examine ways to harmonize voluntary green claims” and it will propose a sustainable food labeling framework that covers the nutritional, climate, environmental and social aspects of food products. This proposal is expected to be published in 2024. There is no additional information on the possible content of this proposal and Post will monitor future developments.

Nutrient profiles in the context of nutrition and health claims

The Commission announced that it would set nutrient profiles to restrict promotion of food high in salt, sugars and/or fat as required by [Regulation 1924/2006](#) before the end of 2022.

Currently, the implementation of Regulation 1924/2006 on nutrition and health claims made on foods remains incomplete since the Commission did not establish nutrient profiles that had to be set by January 2009. In that context, nutrient profiles are thresholds of nutrients such as fat, sugars and salt above which nutrition and health claims are restricted or prohibited. This proposal builds on the results of the EU's [regulatory fitness and performance program \(REFIT\) evaluation](#) of the EU legislation on nutrition and health claims launched in 2015.

Animal welfare labeling

The F2F Strategy includes the objective for the EU to improve animal welfare, improve animal health and reduce the need for medication. In that regard, the Strategy notes that the Commission will consider “options for animal welfare labeling to better transmit value through the food chain.” This might be done through the proposal for a sustainable food labeling framework, expected for 2024.

The idea of animal welfare labeling on food products is not new in the European Union. In 2016, the European Commission conducted a Eurobarometer survey on ‘[Attitudes of Europeans towards Animal Welfare](#)’ in which one section of the survey aimed to understand European views on availability and recognition of products sourced from animal welfare-friendly production systems. The survey found 52 percent of European citizens would look for the identifying labels when buying animal welfare-friendly if a label was used. Additionally, 59 percent of European citizens reported that they are willing to pay at least 5 percent more for animal-friendly products.

Animal welfare labeling already exists in the EU, as Germany's federal government has introduced a voluntary animal welfare label for pork products in 2019. More information: [GAIN Report - Germany: Federal Voluntary Label for Pork to Promote Animal Welfare](#).

Date marking

According to the Farm to Fork Strategy, food waste at all steps of the product lifecycle in the EU, accounts for at least 6 percent of total EU GHG emissions.³ As a way to reduce food waste and food loss in the EU, the Commission also announced that it will propose revisions to EU rules relating to date marking ('use by' and 'best before' dates) before the end of 2022.

Currently, Annex X to the FIC Regulation sets out rules for the indication of the date of minimum durability, use-by date and date of freezing. 'Use by' date is used on highly perishable foods and on each individual pre-packed portion. 'Best before' / 'Best before end' is used on other foods. However, the European Commission has found that better understanding and use of date marking on food could prevent and reduce food waste in the EU. [A study](#) carried out by the Commission in 2018 estimated that up to 10 percent of food waste generated annually in the EU are linked to date marking. More information can be found [here](#).

Stakeholder reactions

Reacting to the publication of the F2F, FoodDrinkEurope, the umbrella organization representing the food and drink industry in the EU, [supported](#) the ambition of the Commission "to become the gold standard for environmental, social, and economic sustainability." However, the organization wants to make sure that the Commission will include a structured dialogue with stakeholders and systematic impact assessments to ensure that food security, food safety, economic recovery and sustainability are not compromised. Regarding specific labeling measures, FoodDrinkEurope regretted the proposal to establish maximum levels for certain nutrients. The organization also expressed doubts about the possible extension of mandatory origin indication to certain products, noting that it could undermine the EU Single Market through protectionist measures. Finally, while they support the principle of EU-harmonized front-of-pack nutrition labeling, FoodDrinkEurope wishes that it stays voluntary and does not become mandatory for all food products.

BEUC, the European Consumer Organization, also [reacted](#) to the publication of F2F, noting "This Strategy is a milestone on the EU's path to sustainable food production and consumption. While we would have hoped for some follow-up actions to happen sooner, at least Europe is now on the right track to a more sustainable food and farming system." Regarding specific labeling measures, BEUC applauded the Commission for making front of pack nutrition labeling mandatory but would have liked a quicker entry into force. BEUC also welcomed the extension of COOL to new products as well as increased information on the sustainability of products.

International Ambitions

In addition to outlining goals within the EU, the F2F Strategy also outlines the EU's global aspirations in this space. The Strategy notes a desire to set the worldwide standard of sustainability and facilitate a global transition to a more sustainable agri-food system. Related to labeling, the F2F Strategy states that the "EU will promote schemes (including an EU sustainable food labelling framework) and lead the work on international sustainability standards and environmental footprint calculation methods in multilateral fora to promote a higher uptake of

sustainability standards.” It also mentions that the EU will work to support the enforcement of rules on misleading information.

Next Steps

The announcement of the F2F Strategy is the first step in a lengthy and complex legislative process. For these labeling measures, the Commission will be asked to conduct impact assessments that can inform but also delay the publication of the draft legislative proposals. Indeed, at the May 20, 2020 Strategy press conference, Commissioner Kyriakides already committed to conducting an impact assessment for the proposed measure on mandatory front-of-pack nutrition labeling.

The Commission carries out [impact assessments](#) for policy initiatives expected to have significant economic, social or environmental impacts. The Commission announces the launch of these assessments to the public first with an inception impact assessment report that states the objectives of the forthcoming impact assessment as well as the timeline for completion. Stakeholders are invited to [comment on the inception report](#). Once the actual impact assessment is underway, the Commission seeks additional input through public consultations and expert group meetings. Upon completion of the impact assessment, the Commission publishes the findings along with its draft legislation.

If the draft is a new legislative proposal, it will be sent to the two EU co-legislators: the European Parliament and the Council. Then the amendment process and negotiations among institutions begins. From draft legislation to publication in *The Official Journal of the European Union*, the EU legislative process typically takes about 18 months; however, timelines vary greatly depending on the sensitivities and urgencies of the topic. If the policy initiative is a non-framework legislation proposal, it will follow different procedures. Any implementing or delegated act proposals follow the EU comitology rules, with limited input from the Parliament and Council, and move more expeditiously than framework legislation. For other proposals, such as guidance documents or enhanced implementation of existing regulations, the Commission has sole authority and can act without co-legislator input. For more information about the EU legislative process, please see the GAIN Report “[How the European Union Works](#).”

Attachments:

No Attachments.