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Report Name: Nutri-Score Labeling Takes Hold in the Netherlands

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Report Highlights:

In 2019, the Dutch Ministry of Health, Welfare and Sport announced a new nutrition labeling scheme for the Netherlands. Nutri-Score, an invention commissioned by French public health agency Santé Publique, would become the new voluntary front-of-pack nutrition label of choice in the Netherlands. The label's introduction, however, faced delays as criticism sparked. Some Dutch scientists argued that Nutri-Score ratings do not always align with national dietary guidelines, that the label can be misleading, and that it can undermine consumer trust. To address the criticism, a scientific committee was set up by the Netherlands and seven European countries (that were using or implementing Nutri-Score). The Committee's mandate is to research possibilities for improving Nutri-Score's alignment with national dietary guidelines. While this work continues, several Dutch food producers and supermarket chains have already started voluntarily using Nutri-Score on their own initiative.

Background on the Nutri-Score Label in the Netherlands

After considering several front-of-pack nutrition labeling schemes (e.g., the [French Nutri-Score system](#), the [Scandinavian Keyhole system](#), and the [British Traffic Light system](#)), the Netherlands opted for “Nutri-Score” in 2019. Nutri-Score is “a front-of-pack label that informs about the nutritional quality of a product, in a simplified and complementary way... based on a five-color nutritional scale....”¹ The State Secretary of the Netherlands’ Ministry of Health, Welfare and Sport commented at the time:

“Making the healthy choice easier, that has always been our commitment. We are now taking a big step in this direction. I chose Nutri-Score {over other European labeling models} because it turns out that this logo best helped consumers in the study to make healthier choices. The logo also came out on top in consumer research in Germany. With this we commit to a logo that will also be increasingly prominently seen internationally....”²

Official introduction of Nutri-Score in the Dutch market was foreseen for the first half of 2022.³ Accordingly, other food choice logos pertaining to the healthiness of food may not be placed by Dutch producers on Dutch packaging.⁴ Introduction of the Nutri-score label is also expected in Luxembourg and Spain,⁵ and it has already been rolled out in Belgium⁶, France, Germany, and Switzerland.⁷

Use of Nutri-Score in the Netherlands is currently voluntary and is not mandatory for food exporters targeting the Dutch market. However, foreign food manufacturers may increasingly find they are competing against European products that carry the label. If a producer decides to use the Nutri-Score label on a product, its use is required on all its products sold (i.e., a producer cannot put the label on some products and not others). Some Dutch food producers⁸ and large supermarket chains (including Albert Heijn, the country’s largest supermarket chain⁹) have already started using the Nutri-Score label.

How Does the Nutri-Score System Work?

It is said the Nutri-Score label is being rolled out as a tool to stimulate healthier consumer choices. The label does so by rating products from ‘A’ (green) to ‘E’ (red), where ‘A’ is the most nutritious product, and ‘E’ is the least nutritious product. Four food categories are distinguished in the labeling scheme: general food, cheeses, fats, and beverages.

¹ <https://www.santepubliquefrance.fr/en/nutri-score>

² <https://www.rijksoverheid.nl/onderwerpen/voeding/nieuws/2019/11/28/nutri-score-wordt-na-aanpassing-het-voedselkeuzelogo-voor-nederland>

³ <https://ec.europa.eu/growth/tools-databases/tris/nl/search/?trisaction=search.detail&year=2021&num=530>

⁴ <https://www.rijksoverheid.nl/onderwerpen/voeding/gezonde-voeding/nieuw-voedselkeuzelogo-nutri-score/invoering-nutri-score>

⁵ <https://www.rijksoverheid.nl/actueel/nieuws/2021/02/12/7-europese-landen-vastbesloten-de-inzet-van-nutri-score-te-vergemakkelijken>

⁶ See, e.g., [BE2018-1802: Belgium Adopts Nutri-Score for Front of Pack Nutritional Labeling](#)

⁷ <https://www.rijksoverheid.nl/onderwerpen/voeding/documenten/publicaties/2021/02/12/wetenschappelijk-comite-inzake-nutri-score>

⁸ See, e.g., [NL2019-2283: Dutch Food Company Adds Nutri-score to Packaged Products](#)

⁹ <https://www.aholddelhaize.com/news/albert-heijn-begins-the-next-steps-of-gradually-introducing-nutri-score/>

It is important to note that the rating applies only within a specific food category. This means the rating should not be used to select the most nutritious product across other food categories (e.g., a consumer is not expected to compare a beverage to another type of food).

The Nutri-Score logo reportedly also fits into a broader Dutch strategy to improve public health. Behind the scenes the Dutch food industry worked together to increase the healthiness of products, a voluntary effort to reach the goals set out in the [Dutch National Prevention Agreement](#). The core focus is the reduction of saturated fats, sugars, and sodium in processed foods through product reformulation.^{10/11} These efforts may not be advertised on the reformulated products. However, with Nutri-Score being calculated using the same components,¹² the belief by some is that Nutri-Score could motivate the food industry to undertake more product reformulations, because these efforts can now be directly translated via the (publicly advertisable) Nutri-Score.¹³ Even so, industry does acknowledge that some products cannot easily improve their Nutri-Score through product reformulation.¹⁴

The Dutch consumer's association, *Consumentenbond*, has noted Nutri-Score's scientifically proven^{15/16} ability to facilitate healthier consumer choices. Addressing the voiced criticism, *Consumentenbond* argues no front-of-pack labeling scheme is perfect and pledged to educate consumers on how to use Nutri-Score through information campaigns.¹⁷

Picture 1. Nutri-Score Labeling in Use at Albert Heijn



Source:<https://www.foodingredientsfirst.com/news/albert-heijn-details-nutritional-value-of-products-through-nutri-score-labeling.html>

¹⁰ https://www.tweedekamer.nl/kamerstukken/brieven_regering/detail?id=2020Z21571&did=2020D45969

¹¹ <https://www.rijksoverheid.nl/onderwerpen/gezondheid-en-preventie/nationaal-preventieakkoord>

¹² <https://www.vmt.nl/52807/nutri-score-aan-welke-knoppen-kan-je-draaien>

¹³ <https://www.delhaize.be/nl/nutriscore-update>

¹⁴ <https://www.tweedekamer.nl/kamerstukken/detail?id=2021D41622&did=2021D41622>

¹⁵ <https://www.rijksoverheid.nl/onderwerpen/voeding/gezonde-voeding/nieuw-voedselkeuzelogo-nutri-score/zo-koos-de-overheid-nutri-score>

¹⁶ <https://www.rijksoverheid.nl/documenten/rapporten/2019/11/28/consumentenonderzoek-voedselkeuzelogo-motivaction>

¹⁷ <https://www.consumentenbond.nl/acties/weet-wat-je-eet/waarom-nutri-score>

Criticism of the Nutri-Score System

However, Nutri-Score's introduction has not been without its critics. The government of Italy has voiced heavy criticism because it feels that Nutri-Score discredits the Mediterranean diet.¹⁸ Italian Minister of Agriculture, Teresa Bellanova, explains: “{we} are against Nutri-Score... and we will present a scientific study hoping that other countries will understand that we should not punish consumers but educate them.”¹⁹ In November 2021, Italy's Antitrust Authority launched an official investigation into Nutri-Score.²⁰ The country is also developing an alternative nutrition labeling scheme, the “[Nutriform battery](#).” An online campaign in Europe, known as the [No-Nutriscore Alliance](#), has also popped up.

The Dutch government also received criticism on Nutri-Score by means of a letter from communication agency, *Voedingsjungle*, backed by more than 175 Dutch scientists and (food) professionals.²¹ The focus of the scientific debate in the Netherlands is on how some products can receive a favorable Nutri-Score rating (A or B) while Dutch dietary guidelines simultaneously advise against eating some of those products.

Nutri-Score's algorithm contains several mechanisms that attribute to these concerns:

- The algorithm aims to reduce the consumption of “negative” components (linked to noncommunicable diseases or risk factors for obesity, diabetes, and cancer), but these ingredients can be offset by the inclusion of other inputs. High levels of “negative” components (energy {kilojoules or kJ²²}, saturated fats, sugars, and sodium) may be offset by the presence of “positive” components: fiber, fruits, vegetables, legumes, nuts, and rapeseed, walnut and olive oil (which are all linked to a lower mortality risk²³). For example, some Dutch scientists have lamented that sugary breakfast cereals can receive an ‘A’ or ‘B’ Nutri-Score rating, whereas such cereals are not recommended under the national dietary guidelines.
- The algorithm might not always point towards the most nutritionally advantageous food, for several reasons:
 - It takes seven parameters into account across four broad food categories (i.e., general food, cheeses, fats and beverages). For example, whole wheat bread and white bread can receive ‘A’ ratings, whereas Dutch dietary guidelines only recommend consumption of whole wheat bread.
 - It does not consider the food preparation method. Scientists argue this becomes apparent with products requiring frying before consumption.
 - It does not consider a product's mineral and vitamin content. Scientists argue this becomes apparent when comparing fresh fruit and canned fruit.

¹⁸ <https://www.politico.eu/article/italys-war-against-french-food-label-starts-to-pay-dividends/>

¹⁹ <https://www.politico.eu/article/italy-sees-red-over-food-labels/>

²⁰ <https://www.agcm.it/media/comunicati-stampa/2021/11/PS12131-PS12183-PS12184-PS12185-PS12186-PS12187>

²¹ <https://voedingsjungle.nl/voedselkeuzelogo/>

²² 1 Kilojoule = 239.005736 calories.

²³ https://www.iarc.who.int/wp-content/uploads/2021/09/IARC_Evidence_Summary_Brief_2.pdf

- Lastly, the algorithm does not account for serving size. Pizza, for example, can score a ‘B’ or ‘C’ rating, and olive oil (after a revision of Nutri-Score’s algorithm) will always receive a ‘C’ rating. However, not all foods are consumed equally. Even though pizza provides an acceptable amount of energy per 100 grams, very few consumers will only eat 100 grams of pizza. Energy intake in one sitting therefore will probably surpass dietary guideline recommendations. The opposite holds true for olive oil, which is usually used sparingly. Still, even though pizza is not recommended by dietary guidelines, it might be perceived by consumers as moderately healthy due to a ‘B’ or ‘C’ rating. Moreover, olive oil, which is recommended by dietary guidelines, might be perceived by consumers as somewhat unhealthy, due to its ‘C’ rating.

Scientists who have expressed concern note that consumers may believe that the healthiest choice is made by choosing a higher Nutri-Score rating when, in fact, they are just making the more nutritionally favorable choice within the algorithm. Their fear is that the lack of conformity with dietary guidelines might even confuse consumers, which may lead to diminished consumer trust in the Nutri-Score system.

To address these concerns, a scientific committee (governed by the seven countries implementing or using Nutri-Score) was created to re-evaluate the algorithm and make suggestions to increase alignment with national dietary guidelines.²⁴

How is the Nutri-Score Rating Calculated?

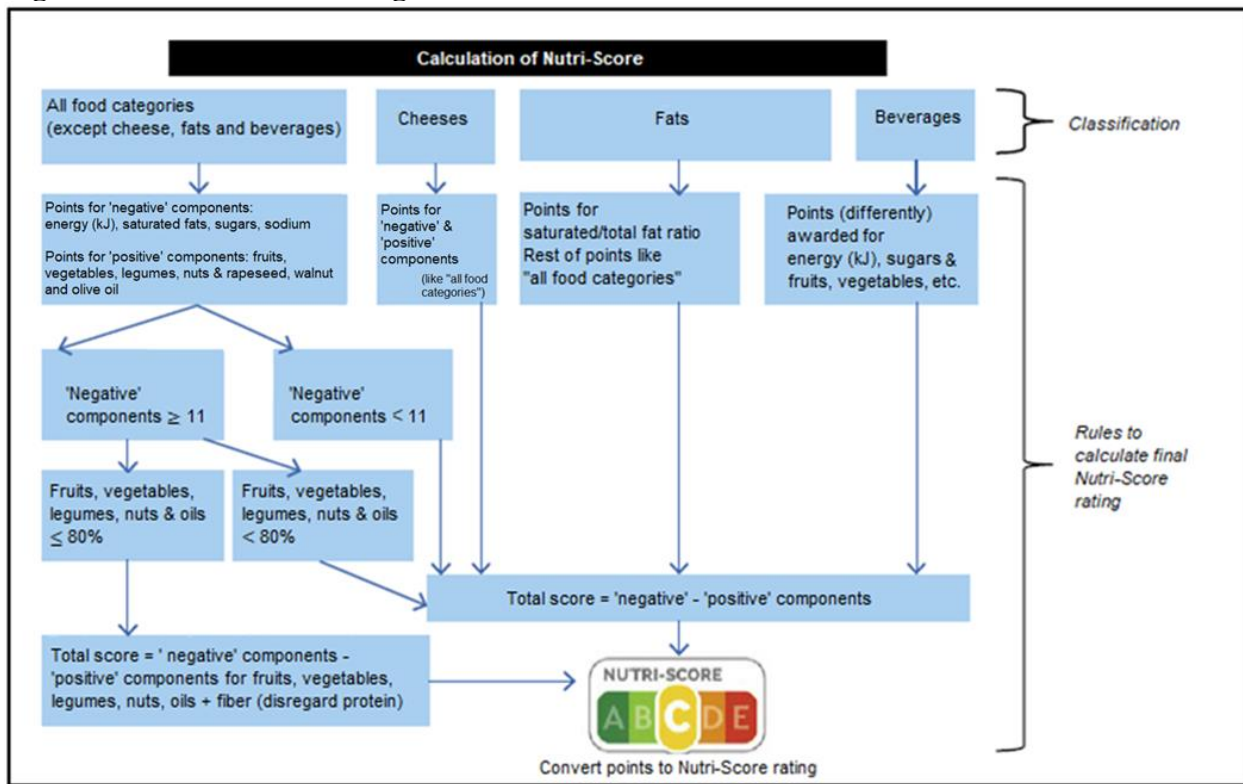
Nutri-Score’s algorithm was adapted from a nutrient profiling system created by the British Food Standards Agency (FSA).²⁵ In summary, high levels of energy, saturated fats, sugars, and sodium will result in a lower Nutri-Score rating. A quick calculation tool is available online [at the Nutri-Score website](#). The algorithm itself is based on points. The fewer points a product receives, the more favorable the ultimate Nutri-Score rating. The chart below outlines the overall process. NOTE: This calculation may still be subject to change due to the aforementioned scientific committee’s evaluations.²⁶

²⁴ <https://www.rijksoverheid.nl/actueel/nieuws/2021/02/12/7-europese-landen-vastbesloten-de-inzet-van-nutri-score-te-vergemakkelijken>

²⁵ http://beh.santepubliquefrance.fr/beh/2015/24-25/2015_24-25_4.html

²⁶ <https://www.gezondheidsraad.nl/actueel/nieuws/2021/09/23/deskundigen-discussieren-over-aanpassingen-aan-voedselkeuzelogo>

Figure 1. Flowchart Detailing How the Nutri-Score is Calculated for a Product



Source: Overall Process of Calculating Nutri-Score, adapted from RIVM, retrieved from: <https://www.rivm.nl/sites/default/files/2019-11/Factsheet%20RIVM%20voedselkeuzelogo.pdf>

The point allocation for all food categories (not covering cheeses, fats, and beverages), is as follows:

- There are four “negative” components: energy (kJ), saturated fats, sugars, and sodium. These “negative” components can score up to 10 points per component. Resulting in up to 40 points for the sum of the “negative” components (see Table 1).
- As previously noted, “positive” components can counterbalance “negative” components. There are three components identified as “positive” components (see Table 2). They can account for up to five points each. The first is fiber and the second component is a whole category of healthy foods: fruits, vegetables, legumes, nuts and rapeseed, walnut, and olive oil. Any of their (combined) presence above 40% in a food counts towards points. The third component is protein, which can only count toward points if a food either scores less than 11 points for “negative” components or contains more than 80% of the aforementioned fruits, vegetables, legumes, nuts or rapeseed, walnut, and olive oil (see Figure 1).

For cheeses, fats and beverages, some different rules apply:

- For cheeses, fats and beverages, points for protein always count towards the total score (see Figure 1).

- For (added) fats (i.e., vegetable oils, margarines, butter, cream, or dairy products used as added fats), there is one alteration. Instead of receiving points for saturated fats, points are given based on the ratio of saturated fatty acids to the total lipid content (see Table 1).
- For beverages, the point allocation is the same as for all food categories but uses a different point scale for three components: energy, sugars, and the last component which is a whole category of healthy foods: fruit, vegetables, legumes, nuts & rapeseed, walnut, and olive oil. For the latter component, a score of up to 10 points can be reached (unlike for any other food). The other point scales (for saturated fats, sodium, and fiber) still apply for beverages, in unaltered form (see Table 1).

Table 1. “Negative” Components: Thresholds for Assignment of Points

Assignment of points for all food categories, based on product composition per 100 grams or 100 ml							
'Negative' components			For BEVERAGES, replace with:		For FATS, replace with:		
Points	Energy (kJ/100 g)	Simple Sugars (g/100 g)	Energy (kJ/100 g)	Simple Sugars (g/100 g)	Saturated Fats (g/100 g)	Total Saturated Fatty Acids/Lipids (%)	Sodium* (g/100 g)
0	≤ 335	≤ 4.5	≤ 0	≤ 0	≤ 1	< 10	≤ 90
1	> 335	> 4.5	≤ 30	≤ 1.5	> 1	< 16	> 90
2	> 670	> 9	≤ 60	≤ 3	> 2	< 22	> 180
3	> 1005	> 13.5	≤ 90	≤ 4.5	> 3	< 28	> 270
4	> 1340	> 18	≤ 120	≤ 6	> 4	< 34	> 360
5	> 1675	> 22.5	≤ 150	≤ 7.5	> 5	< 40	> 450
6	> 2010	> 27	≤ 180	≤ 9	> 6	< 46	> 540
7	> 2345	> 31	≤ 210	≤ 10.5	> 7	< 52	> 630
8	> 2680	> 36	≤ 240	≤ 12	> 8	< 58	> 720
9	> 3015	> 40	≤ 270	≤ 13.5	> 9	< 64	> 810
10	> 3350	> 45	> 270	> 13.5	> 10	≥ 64	> 900
	0-10 (a)	0-10 (b)	0-10 (a)	0-10 (b)	0-10 (c)	0-10 (c)	0-10 (d)
Total	[0 – 40] Points for 'negative' components = (a) + (b) + (c) + (d)						

* = sodium content is the salt mentioned in the mandatory statement divided by 2.5

Source: Adapted from “Nutri Score the Front of Pack Nutrition Labelling Scheme Recommended in France” retrieved from https://ec.europa.eu/food/system/files/2018-04/comm_ahac_20180423_pres4.pdf

Table 2. “Positive” Components: Thresholds for Assignment of Points

Assignment of points for all food categories, based on product composition per 100 grams or 100 ml				
Points	Fruits, vegetables, legumes, nuts and rapeseed, walnut and olive oils (%)	For BEVERAGES, replace with:	'Positive' components	
		Fruits, vegetables, legumes, nuts and rapeseed, walnut and olive oils (%)	Fibers (g/100 g) (AOAC method)	Proteins (g/100 g)
0	≤ 40	≤ 40	≤ 0.7	≤ 1.6
1	> 40		> 0.7	> 1.6
2	> 60	>40	> 1.4	> 3.2
3	-		> 2.1	> 4.8
4	-	>60	> 2.8	> 6.4
5	> 80		> 3.5	> 8.0
6				
7				
8				
9				
10		> 80		
	0-5 (a)	0-10 (a)	0-5 (b)	0-5 (c)
Total	[0 – 15] Points for 'positive' components = (a) + (b) + (c*)			






* = included for cheeses, fats and beverages; only included for "all food categories" if i) points for 'negative' components <11 or ii) if > 80% food content is fruits, vegetables, legumes, nuts or rapeseed, walnut and olive oils.

Source: Adapted from “Nutri Score the Front of Pack Nutrition Labelling Scheme Recommended in France” retrieved from https://ec.europa.eu/food/system/files/2018-04/comm_ahac_20180423_pres4.pdf

Calculation of total score and subsequent Nutri-Score rating:

- After having attributed all points (as described above, and as outlined in Figure 1), a total score can be calculated. For this, subtract points for “positive” components from the points for “negative” components.
- The total number of points translates into the Nutri-Score rating as shown below in Table 3. (Please note that the fewer the points, the more favorable the ultimate Nutri-Score rating).

Table 3. Nutri-Score Ratings Corresponding to Number of Points Calculated using the Nutri-Score Algorithm

Total score (points) Food	Total score (points) Beverages	Converts to Nutri-Score
-15 to -1	Water	→ 
0 to +2	-15 to +1	→ 
+3 to +10	+2 to +5	→ 
+11 to +18	+6 to +9	→ 
+19 and more	+10 and more	→ 

Source: Adapted from <https://www.bmel.de/DE/themen/ernaehrung/lebensmittel-kennzeichnung/freiwillige-angaben-und-label/nutri-score/naehrwertkennzeichnung-hilfestellungen.html#doc73490bodyText7>

NOTE: Some exceptions may apply. These can arise when determining whether a product falls under a certain category (e.g., many milk beverages do not fall under the category of beverages nor can alcoholic drinks carry a Nutri-Score).

Additionally, some components may or may not count towards points (for example, non-rehydrated concentrated fruit juices do not count as “fruit”). Producers are encouraged to consult [Nutri-Score’s scientific Q&A](#) or [apply through the Nutri-Score website](#) for more information.

What is the Future of Nutri-Score?

The future of Nutri-Score in the Netherlands is not completely clear yet. The future applications for Nutri-Score labels are potentially considerable. Research is underway to see if recipes can be assigned a Nutri-Score,²⁷ which might have an impact on Dutch caterers and restaurants. Consumers shopping online can already filter their product searches based on Nutri-Score ratings on the online shopping portal of Dutch supermarket chain, Albert Heijn.²⁸

It is possible that consumers may alter their buying decisions based on Nutri-Score ratings and that food manufacturers may need to adapt products to better fit Nutri-Score. However, there are many in the food sector who question the initiative, even though Nutri-Score’s algorithm is currently under re-evaluation to address criticism that Nutri-Score, in its current form, might contribute towards consumers making choices that are not in line with dietary guidelines.

²⁷ <https://www.santepubliquefrance.fr/media/files/02-determinants-de-sante/nutrition-et-activite-physique/nutri-score/gr-scientifique-technique-en>

²⁸ <http://www.ah.nl>

In February 2022 this debate reached a new milestone after a complaint was filed with the Dutch Advertising Code Committee, by the communication agency involved in the Dutch debate on Nutri-Score.²⁹ Supermarket chain, Albert Heijn, was targeted for its preliminary use of Nutri-Score (before Nutri-Score's official introduction {and anticipated adaptation} by the Dutch government). The plaintiffs state that until Nutri-Score is implemented in Dutch law, it is an unauthorized health claim and therefore may not be used. A ruling is expected in the near-term. Prior to this, the Dutch Ministry of Health, Welfare and Sport allegedly had already reached out to Albert Heijn, requesting it stop its preliminary advertising of Nutri-Score.³⁰

Developments are also anticipated on the European Union level. Under the EU's Farm to Fork strategy's action plan, a proposal for harmonized mandatory front-of-pack nutrition labeling will be submitted before the end of 2022.^{31/32} In this respect, the Netherlands made an interesting statement in 2020: "The Dutch effort focuses on introducing Nutri-Score at the European level".³³ Meanwhile another European front-of-pack label has rapidly gained momentum, which (unlike Nutri-Score) shows the sustainability of food products: known as Eco-Score.³⁴ Several supermarket chains have already committed to its use.³⁵ As such, the expectation is that both voluntary and mandatory front-of-pack labeling of food will remain on the agenda for the coming years in Europe.

Attachments:

No Attachments.

²⁹ <https://www.nieuwsvoordietisten.nl/klacht-over-albert-heijn-vanwege-vroege-invoering-nutri-score/>

³⁰ <https://www.distrifood.nl/formules/nieuws/2022/02/ministerie-vws-tikte-ah-op-vingers-om-campagne-nutri-score-101155471>

³¹ https://ec.europa.eu/food/horizontal-topics/farm-fork-strategy_en

³² <https://www.efsa.europa.eu/en/news/efsas-scientific-advice-inform-harmonised-front-pack-labelling-and-restriction>

³³ https://www.tweedekamer.nl/kamerstukken/brieven_regering/detail?id=2020Z21571&did=2020D45969

³⁴ <https://www.consumentenbond.nl/duurzamer-eten/eco-score>

³⁵ <https://agrifoodnetworks.org/article/colruyt-lidl-and-carrefour-are-testing-the-eco-score-but-who-decides-on-the>