



## CONSULTATION: Food labelling – revision of rules on information provided to consumers

RESPONSE FROM THE EUROPEAN CANCER ORGANISATION (03 FEBRUARY 2021)

### ***Our support for EU action on cancer prevention***

The European Cancer Organisation supports the role and the need for the European Union in helping countries take bold actions on cancer prevention together, be this in respect to reducing tobacco and alcohol use, achieving greater protection against UV exposure and occupational cancer risk, the promotion of vaccine take up in respect to vaccine preventable cancers, and initiatives and measures to improve diet and exercise.

### ***Obesity and the European cancer burden***

As the Commission's consultation roadmap document makes clear, over half of the adult population are now overweight. Excess body fat is associated with nine cancer sites (oesophagus, colorectum, gall bladder, pancreas, postmenopausal breast, endometrium, ovary, kidney and prostate [advanced stage]), accounting for an estimated 5-6.5% of the European cancer burden.

### ***Helping consumers make informed choices***

Measures to improve the information available to consumers to assist them in making healthy dietary choices are clearly an important tool at Governments' disposal to help drive positive behaviour changes. As stated in relevant representations made by European Cancer Organisation and its partners in 2020, such as the Strengthening Europe in the Fight Against Cancer study commissioned by the European Parliament's ENVI Committee, the ECL's Position Paper on Europe's Beating Cancer Plan and the ECDA-EPHA-EONS-EPF-EUPHA Joint Letter to the AGRIFISH Council, this can notably be achieved by helping consumers to make informed choices about food products through the introduction of a standardised mandatory front-of-pack nutrition labelling system. We therefore express support for the Commission to bring about harmonised mandatory front-of-pack nutrition labelling, and the setting of nutrient profiles.



We join with other organisations focused on the public health interest, such as the European Chronic Disease Alliance, in calling for an EU level system of front-of-pack food labelling that is mandatory for all EU member states, interpretative and uniform.

### ***Easy-to-understand scoring schemes***

Interpretive schemes that provide information to help consumers understand how healthy/unhealthy a product is, such as Nutri-Score, make the nutritional information immediately understandable and will significantly support the success and achievement of purpose of front-of-pack labelling.

Exemptions from the labelling requirements should be very carefully limited to prevent undermining of its purpose and uniform reference values (e.g. per 100g or ml) should be indicated for all products.

### ***Obesity needs attention when addressing preventative measures***

When considering obesity and cancer, we remind of the overall need for policy makers to understand, as well as prevention measures, the need for attention to obesity as a gateway condition for cancer, and as a significant co-morbidity. We refer to the European Association for the Study of Obesity as an important source of expertise and reference in these matters.

We kindly ask that our association be listed among the interested stakeholder organisations to this proposal in respect to ongoing consultation activity by the Commission after 03 February 2021.