



An Roinn Sláinte
Department of Health



Public Consultation Report

Front-of-Pack Nutrition Labelling, Nutrient Profiles, Origin Labelling and Date Marking

Introduction

‘The European Green Deal’ sets out how to make Europe the first climate-neutral continent by 2050. The ‘Farm to Fork Strategy - for a fair and environmentally friendly food system’ is part of the European Green Deal, recognising the inextricable links between healthy people, healthy societies and a healthy planet. In terms of food labelling, the provision of clear information that makes it easier for consumers to choose healthy and sustainable diets will benefit their health and quality of life and reduce health-related costs.

To empower consumers to make informed, healthy and sustainable food choices, the European Commission will develop proposals for harmonised mandatory front-of-pack nutrition labelling and setting nutrient profiles. The Commission will also consider proposing the extension of mandatory origin or provenance indications to certain products (taking into consideration the impact on the Single Market) and a revision of the EU rules on date marking (‘use by’ and ‘best before’).

In order to gather information and opinions to inform the development of an Irish national position, and to provide for all interested parties in Ireland to make their views known, the Food Safety Authority of Ireland (FSAI) hosted a public consultation on behalf of the Department of Health calling for views and feedback. The consultation ran from 11th February to 25th March 2021. This public consultation report has been prepared by the Department of Health and the FSAI.

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Summary of results

Total number of online respondents	262
In favour of a harmonised EU-wide front-of-pack (FoP) nutrition labelling scheme	91%
Preferred option for FoP nutrition labelling scheme: colour-coded nutrient-specific labelling (e.g. multiple traffic light)	62%
In favour of a mandatory FoP nutrition labelling scheme	79%
Not in favour of allowing exemptions from a harmonised FoP nutrition labelling scheme for certain food categories	56%
In favour of establishing harmonised EU-wide nutrient profiles	87%
Not in favour of allowing exemptions from the application of nutrient profiles for certain food categories	60%
In agreement that nutrient profiles could serve different purposes	76%
In favour of introducing additional EU-wide mandatory origin labelling to other foodstuffs	82%
In agreement that additional origin labelling can help consumers make informed food choices	85%

Preferred geographic level for origin indication: regional (e.g. naming/labelling the town, country, region)	39%
In agreement that visual elements (such as flags, emblems) help consumers to better understand origin labelling and should therefore be included on the label	68%
In agreement that visual elements for origin labelling should be used in combination with text	92%
Most preferred option to improve date marking: by improving expression and presentation of current marking	37%

Note:

The consultation did not ask a question to identify the type/sector of respondent.

Where respondent comments are reproduced in the report, these have been randomly selected and represent that respondent’s views only.

Comments are anonymised where necessary, as indicated via listing of the stakeholder category in square brackets, e.g. [consumer NGO].

Front-of-Pack (FoP) Nutrition Labelling

Question 1: Would you be in favour of a harmonised EU-wide front-of-pack (FoP) nutrition labelling scheme?

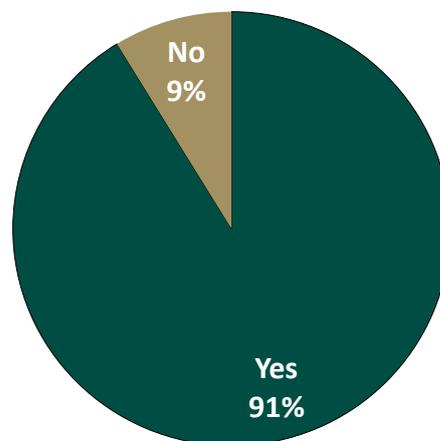


Figure 1: 262 respondents indicated a preference for or against a harmonised EU-wide front-of-pack (FoP) nutrition labelling scheme.

262 respondents answered this question. Of those, 91% (239 respondents) were in favour of a harmonised EU-wide FoP nutrition labelling scheme. The remaining 9% (23 respondents) were not in favour of adopting a harmonised approach.

149 of the respondents who indicated support for a harmonized EU-wide FoP nutrition labelling scheme provided a comment to indicate their reasoning, which was a sufficient number to support further analysis. The main reasons given included:

- To ensure consistency across the EU (37.6%; 56 respondents);
- For clarity and to allow comparisons between foods (26%; 39 respondents); and

- To inform consumers to allow for healthier food choices (26%; 39 respondents).

Some of the comments provided by those respondents who indicated they did not support a harmonised EU-wide FoP nutrition labelling scheme are listed below:

- “Not necessary on all foods.”;
- “Would need to be aligned to UK. Harmonised EU system would require extra packaging for all SKU's [stock-keeping units] shared between Ireland and UK as they can no longer be shared. This would lead to a significant cost increase.”;
- “It doesn't make sense for all products. For example, flour. You can make healthy bread or a cake with butter cream. The flour itself is a basic ingredient. A FoP nutrition labelling scheme only makes sense for processed foods, not for single-ingredient products. also the costs of packaging for producers are huge. Small producers simply cannot afford to keep changing their packaging for 'nice to have' pieces of information. The legislation is complex enough - practically impossible to navigate at this stage. This only complicates matters.”;
- “Nutrition information is already readily accessible to consumers via the nutrition information table. FOP labelling will be additional work for food manufacturers and may not provide much benefit.”;
- “Concerns this may impact consumer choice for food imported from outside the EU.”.

Question 2: What type of labelling scheme would be the preferred option for harmonised EU-wide FoP nutrition labelling?

Four options were presented, and respondents were allowed to choose more than one:

1. Nutrient-specific labels - numerical (e.g. reference intakes);
2. Nutrient-specific labels - colour-coded (e.g. multiple traffic light labelling);
3. Summary labels - endorsement logos (e.g. Keyhole); or
4. Summary labels - graded indicators (e.g. Nutriscore).

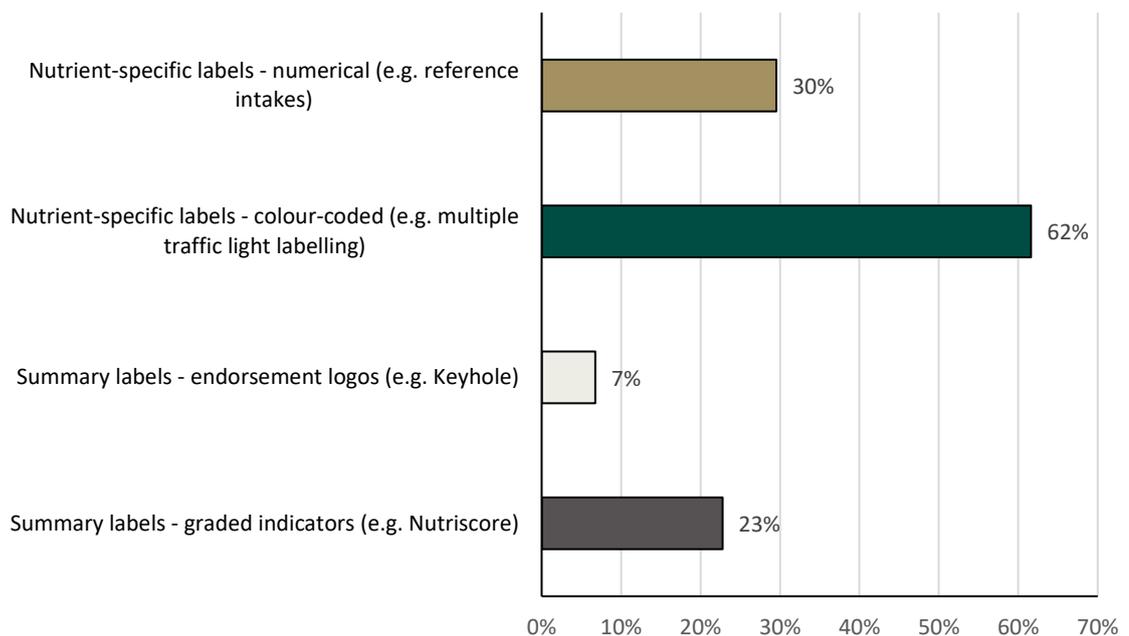


Figure 2: 237 respondents indicated their preferred option for a harmonised EU-wide FoP nutrition labelling scheme. Respondents were allowed to choose more than one option.

237 respondents answered this question. Of those, 62% (146 respondents) selected nutrient-specific colour-coded labels (e.g. multiple traffic light labels) as the best option. 30% (70 respondents) selected numerical nutrient-specific labels (e.g. reference intakes). 23% (54 respondents) selected graded indicator-based summary labels (e.g. Nutriscore). 7% (16 respondents) selected endorsement logo-based summary labels (e.g. Keyhole).

The number of comments provided for each of the four options was too low for further analysis.

Some of the comments provided by those respondents who selected the most popular option, i.e., nutrient-specific colour-coded labels (e.g. multiple traffic light labels), are listed below:

- “Colour coded while with disadvantages is simple and easiest to understand as part of a single EU wide system.”;
- “Think this is clear & easily understandable for consumers - don’t fully understand Option 3 or 4.”;
- “More visible and easy to understand.”;
- “Colors will make it more visual therefore easier to make up our mind when buying.”;
- “On behalf of [consumer NGO] we support traffic lights labelling - at present in Ireland we have a mix of traffic lights labelling along with RDAs - we fear the introduction of a mandatory Nutriscore scheme - we must be aware that we have a marketplace with many UK food products so there would be confusion if the existing traffic lights/RDAs continued allied to Nutriscore being mandatory at EU level. With Nutriscores there are examples of when a soft drink of type cola light shows a higher score and is classified in category B (open green) as more nutritious than a standard juice that comes out category C (yellow) we as a consumer NGO believe that is a real problem with the Nutriscore model.”.

Some of the comments provided by those respondents who selected the second most popular option, i.e., nutrient-specific numerical labels (e.g. reference intakes), are listed below:

- “For sensible portion sizes that meet nutrition and healthy eating guidelines.”;
- “More informative and definitive.”;
- “Simplification is welcome but oversimplification would be a disservice to consumer education.”;
- “I think a combination of the above is necessary, so that it covers needs of more consumers. The nutrients specific labels will provide more insight into what we are consuming and will appeal to those who already are savvy in nutrition labelling. I also prefer summary labels using a graded indicator rather than a colour-coded traffic light since it is the overall food that should be assessed for nutrition and not isolated nutrients.”;
- “Showing sugar content.”.

A number of comments were recorded from respondents who did not select one specific FoP nutrition labelling option. Some of these comments are reflected below:

- “Not sure if any of them really do the job - needs to be visual, needs to include summary energy /nutrient info but also specific for dietary concerns such as sodium (hypertension), carbohydrates (diabetes), gluten (allergy). FOP info must be detached from any marketing purpose!! Personally a grading scheme from low level of processed to over processed food should be included (research shows impact of processed food on weight gain when all other criteria equal).”;
- “Unsure. Keyhole doesn't suggest food to me. And a lot of people I know don't understand or don't even know what the Traffic light system is even now. No point in changing all these labels if people don't even understand them.”;

- “In the EU [food manufacturer] supports the visual expression of Nutri-Score, however we believe that the nutrient profile behind the scheme would benefit from adaptation, so that it is improved to be portion/product group based and better aligned to dietary guidelines. We welcome the work of the scientific committee that is reviewing the nutrient profile and welcome transparency on the work. In terms of the traffic light labelling that is used in UK, this scheme could be improved if it took small portions into consideration. The colour coded element is based on 100g and currently only makes adaptations for products with portions above this but not below.”;
- “No one labelling scheme appropriately covers all food products.”;
- “Unfortunately, all of the proposed labelling schemes have the potential to counteract the objective of FOPNL – due to the narrow range of single nutrient indicators, there is a risk that the proposed models may actually mislead or confuse a consumer rather than assist them in making a more informed choice. For example, the nutrient density of cheese and its contribution to a healthy, balanced diet could get overlooked by only highlighting factors such as energy, fat, salt, sugar, fibre and ignoring the valuable nutrient density and scientifically acknowledged role as part of a healthy diet. The proposed schemes may also be counterproductive for foods that are not intended as part of a normal balanced diet e.g. specialised nutrition products (perhaps they should be exempt or free to opt-out of FOPNL).”.

Question 3: Should a FoP nutrition labelling scheme be mandatory or voluntary?

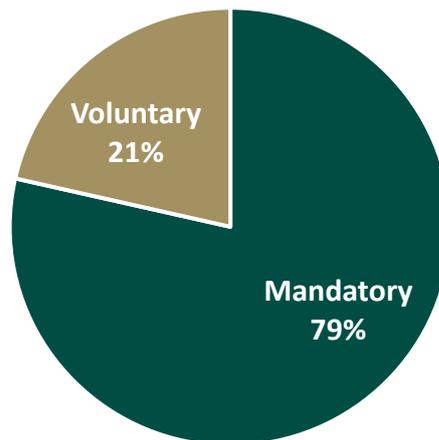


Figure 3: 257 respondents indicated a preference for either a mandatory or a voluntary FoP nutrition labelling scheme.

257 respondents answered this question. Of those, 79% (204 respondents) would prefer the FoP nutrition labelling scheme to be mandatory. The remaining 21% (53 respondents) opted for a voluntary scheme.

91 of the respondents who indicated a preference for a mandatory FoP nutrition labelling scheme provided a comment to indicate their reasoning, which was a sufficient number to support further analysis. The two main reasons cited were as follows:

- A mandatory scheme was seen as being more effective and ensuring that the FoP nutrition labelling scheme will be taken on board. There is a risk of 'opt-out' if a mandatory scheme is not put in place (47%; 43 respondents).
- A mandatory scheme was viewed as ensuring that consumers get the information that they need to make informed healthy choices. This would be available on all foods should a mandatory approach be adopted (33%; 30 respondents).

Some of the comments provided by those respondents who indicated that any FoP nutrition labelling scheme should be voluntary are listed below:

- “We believe that the FOP nutrition labelling scheme should be voluntary. A mandatory scheme would introduce significant cost to the business since all our labels currently have nutrient specific colour coded labelling. Due to the size of some of our labels mandatory labelling wouldn’t always be feasible. [Food manufacturer] was one of the first companies to sign up to the FOP labelling scheme in UK&I and in 2005 started applying FoP Nutrition labelling.”;
- “Small local producers like on farmers markets should retain their individuality.”;
- “I think that nutritional information is on back of pack, and is enough for some products.”;
- “Should be compulsory for 'factory foods' but raw foods no.”;
- “Not all members of the public understand nutritional labelling enough to discern between good and bad. For example, cheese is high fat, bread is high carbs, both of which might be perceived to be "bad".”.

Question 4: Should a harmonised FoP nutrition labelling scheme allow for exemptions for specific food categories such as single ingredient foods or those foods with protected designation of origin or geographical indications?

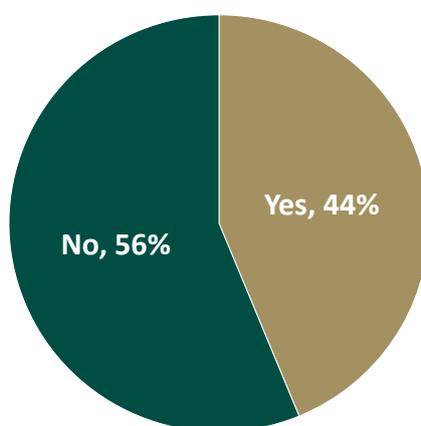


Figure 4: 249 respondents indicated their views regarding an exemption from FoP nutrition labelling for specific food categories such as single ingredient foods or those foods with protected designation of origin or geographical indications.

249 respondents answered this question. Of those, 56% (140 respondents) did not think that there should be exemptions for specific food categories such as single ingredient foods or those foods with protected designation of origin or geographical indications. The remaining 44% (109 respondents) felt that certain exemptions should apply.

The number of comments provided for each of the two options was too low for further analysis.

Some of the comments provided by those respondents who believed that exemptions to FoP nutrition labelling should not be applied for specific food categories are listed below:

- “All products should bear the front of pack label as they are designed to help consumer make a healthier choice. If a consumer is choosing a product with protected designation of origin or geographical indicators, they still should be provided with information using the front of pack nutrition label so they can evaluate how this will fit into their diet. These products may be high in saturated fat or salt for example and consumer should be made aware of this. We do support a continuation of the exemption for alcohol products from front of pack nutrition labelling, as well as the exemption for small packaging formats.”;
- “We need to be transparent regardless of the food type.”;
- “This may lead to producers trying to find exemptions or manipulation. Education as to the acceptable levels of 'special/treat' in all diets can mitigate potential problems.”;
- “I think that all food products should be governed by the same schemes to make it easier for the consumer.”;
- “Some protected foods are bad, again this is not really the point. It is not to say don't eat things that are high in fat/sugar but simply to point out that this is high in fat/sugar so maybe don't eat too many things like this.”.

Some of the comments provided by those respondents who believed that exemptions to FoP nutrition labelling should be applied for specific food categories are listed below:

- “Single ingredient foods from nature should be exempt such as fruit and veg, whole grains, nuts, unprocessed meat. If this was required for these foods it would result excess and unnecessary packaging resulting in environmental damage and higher costs for natural healthy food.”;

- “Yes, single ingredient foods should be excluded. FoP nutrient labelling is not beneficial for single ingredient food products which are used as a one part of healthy cooking or meals (such as butter, milk, cheese, meat etc). This is because, in accordance to a 2008 scientific opinion of EFSA “there is an inherent difficulty in seeking to apply to individual food products nutrient intake recommendations that are established for the overall diet”, notably because “they do not take into account changes in nutrient content that occur during cooking or preparation”. Therefore proper information cannot be adequately provided for single ingredient products without knowing their intended use and quantity within a meal. FoP nutrient labelling is however useful for foods which are processed (such as ready meals, prepared sandwiches etc) and would be consumed as is without alteration.”;
- “As per current labelling regulation (EU) No 1169/2011, we believe that any products that are exempt from mandatory legislative labelling should also be exempt from any mandatory nutritional labelling.”;
- “Low production artisan foods should be able to apply for exemption. To accommodate small packaged items with limited ingredients.”;
- “Single ingredient unprocessed food like fruits and vegetables, grains, cereals, nuts, pulses, legumes, edible oils do not require nutrient labelling. Labelling for origin should be mandatory for all food stuff.”.

Some respondents indicated in their comments one or more types of food products for which they believed exemptions from a harmonised FoP nutrition labelling scheme should apply:

- Single ingredient foods (26 respondents);
- Dairy products (specific products mentioned include butter, cheese, natural yogurt) (13);
- Oils (specific products mentioned include olive, coconut, rapeseed oils) (10);
- Fruit and vegetables (8);
- Foods which have been granted protected designation of origin (PDO) or protected geographical indication (PGI) (7);

- Food for specific groups as defined under Regulation (EU) 609/2013 (foods for young children/infant formula were specifically mentioned) (6);
- Meat (products mentioned include dried ham and unprocessed meat) (6);
- Food products currently eligible for small pack exemptions under Regulation (EU) 1169/2011 (4);
- Wholegrains/cereals (3);
- Chewing gum/sugar-free confectionary (2);
- Food products produced by low volume/artisanal producers (2);
- Food supplements (2);
- Nuts (2);
- Pulses/Legumes (2);
- "Sports" foods (2);
- Sugar (2);
- Bottled water (1);
- Eggs (1);
- Unlabelled fresh food (1); and
- Wine (1).

Nutrient Profiles

Question 5: Would you be in favour of establishing harmonised EU-wide nutrient profiles?

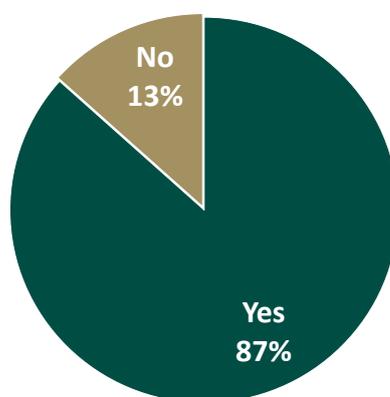


Figure 5: 247 respondents indicated a preference for or against establishing harmonised EU-wide nutrient profiles.

247 respondents answered this question. Of those, 87% (214 respondents) were in favour of establishing harmonised EU-wide nutrient profiles. The remaining 13% (33 respondents) were not in favour.

70 respondents who indicated a preference for establishing harmonised EU-wide nutrient profiles provided a comment to indicate their reasoning, which was a sufficient number to support further analysis. The main reasons provided included:

- EU consistency - “same when selecting food when travelling in EU”, “everyone the same” (29%; 20 respondents); and
- Nutrient profiles will inform consumers making it easier for them to make healthy food choices (21%; 15 respondents).

Some of the comments provided by those respondents not in support of establishing EU-wide FoP nutrient profiles are listed below:

- “Whilst simplification is welcome, oversimplification may lead to undesirable outcomes for consumers and producers alike.”;
- “Different regions in Europe have differing food manufacturing practices and flavour preferences and other traditions in ingredient use. Which results in a wide variety and interesting foods across Europe.”;
- “FoP standard must be cohesive, aligned and set off a fair comparison, therefore a basis of standard must be considered, if done at 100g/ml as per FIC Regulation or per serving size recommended by manufacturer - therefore setting nutrient profile will generate unfair comparisons on different food product categories.”;
- “I do not see the benefit. Most people can read, and if it is a colour scheme it should be possible for the consumer to identify whether the product is 'healthy' or 'not so healthy', based on green, orange or red.”;
- “[Supermarket chain] has been working on a reformulation programme for five years in order to reduce the salt and sugar in our products. This is part of the UK Government’s childhood obesity strategy, which is being adopted for [Supermarket chain] across GB & IE. Promoting products with nutrition and health claims (low sugar/salt) is beneficial to allow customers to make healthier choices. The concern is moving to a harmonized approach for nutrient profiles leaves a risk of promoting food as healthy and unhealthy whereas a balanced approach is required. High Fat products may also contain essential vitamins and minerals required by the body as part of a healthy balanced diet. Any divergence in labelling schemes across the EU and UK markets would have significant implications if the different approaches were not permitted to co-exist on the Irish market. The [Supermarket chain] supply base for food and drink markets are intrinsically linked. Many companies manage the two markets as a single business unit.”.

Question 6: Should harmonised nutrient profiles allow for exemptions from the application of nutrient profiles for specific food categories such as single ingredient foods, or those with protected designation of origin or geographical indications?

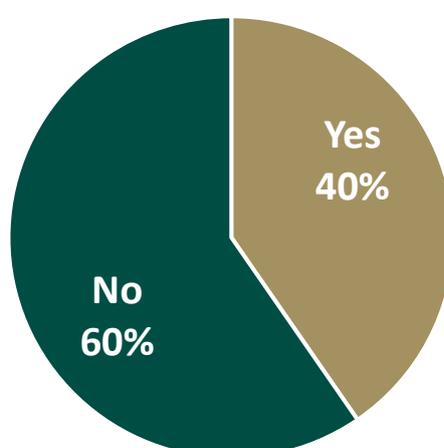


Figure 6: 240 respondents expressed a view on the possibility of exemptions for specific food categories, such as single ingredient foods, or those with protected designation of origin or geographical indications, from harmonised nutrient profiles.

240 respondents answered this question. Of those, 60% (143 respondents) believed that exemptions from the application of harmonised nutrient profiles should not apply to specific food categories, such as single ingredient foods, or those with protected designation of origin or geographical indications. The remaining 40% (97 respondents) were in favour of exemptions for certain products.

The number of comments provided for each of the two options was too low for further analysis.

Some of the comments provided by those respondents who believed that exemptions to harmonised nutrient profiles should not be applied for specific food categories are listed below:

- “Need uniform approach.”;
- “It should be transparent. I personally despise the "natural flavors" written on the labels without telling me what they are, and they never are Vegetarian.”;
- “Again need to have standard labelling to understand foods.”;
- “It's important for people to know that single ingredient foods such as fruit and veg are nutritious. Foods of protected origin or geo. indications are generally 'occasional foods' but still have nutritional pros and cons.”;
- “The consumer needs to be empowered with easy to understand information in order to make informed decisions about healthier options.”.

Some of the comments provided by those respondents who believed that exemptions to harmonised nutrient profiles should be applied for specific food categories are listed below:

- “To avoid unnecessary use of packaging on single ingredient products.”;
- “Single ingredient foods, traditional production methods and those with protected designation status should be exempt to preserve local customs, traditions and flavours.”;
- “Single ingredient foods from nature should be exempt such as fruit and veg, whole grains, nuts, unprocessed meat. If this was required for these foods it would result excess and unnecessary packaging resulting in environmental damage and higher costs for natural healthy food.”;
- “Single food ingredients should be excluded.”;

- “Single ingredient unprocessed food like fruits and vegetables, grains, cereals, nuts, pulses, legumes, edible oils do not require nutrient labelling. Labelling for origin should be mandatory for all food stuff.”.

Some respondents indicated in their comments one or more types of food products for which they believed exemptions from a harmonised nutrient profile should apply:

- Single ingredient foods (20 respondents);
- Foods which have been granted protected designation of origin (PDO) or protected geographical indication (PGI) (8);
- Fruit and vegetables (4);
- Food supplements (3);
- Food for specific groups as defined under Regulation (EU) 609/2013 (3);
- Dairy products (cheese was specifically mentioned) (2);
- Food products produced by low volume/artisanal producers (2);
- Meat (unprocessed meat was specifically mentioned) (2);
- Oils (specific products mentioned include extra virgin and virgin olive oil) (2);
- “Sports” foods (2);
- Bottled water (1);
- Chewing gum/sugar-free confectionary (1);
- Eggs (1);
- “Food service” products (1);
- Herbs and spices (1);
- Nuts (1);
- Small, packaged items with limited ingredients (1);
- “Speciality” foods (1); and
- Wholegrains (1).

Question 7: Do you think that harmonised nutrient profiles could serve different purposes (e.g. FoP nutrition labelling, nutrition and health claims or restricting the marketing of foods)?

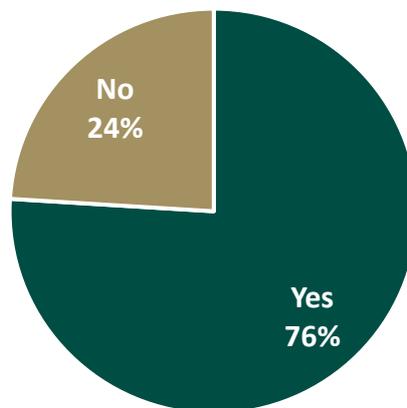


Figure 7: 229 respondents expressed a view on whether harmonised nutrient profiles could serve different purposes.

229 respondents answered this question. Of those, 76% (174 respondents) indicated they believed that harmonised nutrient profiles could serve different purposes including FoP nutrition labelling, nutrition and health claims or restricting the marketing of foods. The remaining 24% (55 respondents) indicated they did not support this statement.

The number of comments provided for each of the two options was too low for further analysis.

Some of the comments provided by those respondents who did not believe that harmonised nutrient profiles could serve different purposes are listed below:

- “We don’t support Nutrient Profiling as we believe setting general nutrient profile will generate unfair comparisons on different food product

categories.....and can bring negative perception on certain nutrients e.g., fat.”;

- “No one nutrient profile scheme can appropriately cover different purposes.”;
- “Currently products can make a nutrition claim; regardless of their overall nutritional status, e.g. a high fat product can make a low sugar claim, providing they comply with the legal requirements of the Claims Regulation (EC) No 1924/2006. Many foods that could be deemed unhealthy as they are high in fat contain vitamins and minerals required by the body for a healthy balanced diet e.g. Cheese. There is also a concern that restricting the marketing of food may result in less consumer purchase and undermine the reformulation work completed to date on [supermarket chain] products to reduce the salt/sugar levels in line with government initiatives.”;
- “A robust nutrient profile should be tailored for its specific purpose.”;
- “I think these will confuse the consumer.”.

Some of the comments provided by those respondents who did believe that that harmonised nutrient profiles could serve different purposes are listed below:

- “Harmonised profiles should help with some products marketing themselves as healthy when they clearly are not. Or as a low fat product that has subsequently been loaded with sugar to replace fat. Or low sugar which has been replaced with an artificial sweetener.”;
- “Such other purposes would be informed by legitimate science.”;
- “I think health claims can be very misleading if you don't know the background and take the manufacturers information as concrete.”;
- “A clear nutrient labelling regime will ensure that nutritional claims are indeed valid and do not mislead.”;

- “The [consumer NGO] believes that they could assist in other in FoP labelling etc BUT we would ask for the Commission to firstly establish the nutrient profiles - we have been waiting a very long time for them to be established.”.

Origin labelling

Question 8: Would you be in favour of introducing additional EU-wide mandatory origin labelling to other foodstuffs?

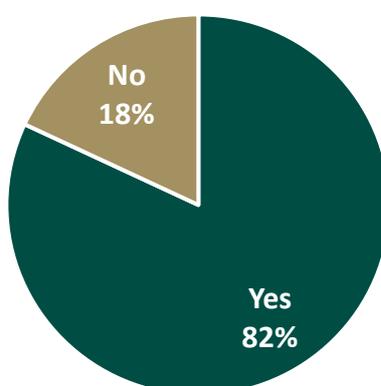


Figure 8: 244 respondents expressed a view regarding introduction of mandatory origin labelling to additional food categories across the EU.

244 respondents answered this question. Of those, 82% (200 respondents) were in favour of the introduction of mandatory EU-wide origin labelling to additional foodstuffs/food categories. The remaining 18% (44 respondents) were not in favour of an extension of mandatory origin labelling.

The number of comments provided for each of the two options was too low for further analysis.

Some of the comments provided by those respondents who were in favour of introducing EU-wide mandatory origin labelling to other foodstuffs are provided below:

- “Nice to know its air miles.”;

- “Food and drink provenance is a big issue at present and current regulations are too weak and badly enforced.”;
- “I want to know where my food comes from and where the ingredients come from, so that I can also take a sustainable food decision (air miles, deforestation, water supply...).”;
- “Consumers should know the origin of every single foodstuff they are buying.”;
- “The more readily accessible information for the consumer the easier it is to make informed choices.”.

Some respondents indicated in their comments one or more types of food products to which they believed mandatory origin labelling should be extended:

- Everything (5 respondents);
- Soft drinks (2);
- Alcoholic drinks (2);
- Pasta (1);
- Processed beef products (1) and
- Dairy products (1).

Some of the comments provided by those respondents who were not in favour of introducing EU-wide mandatory origin labelling to other foodstuffs are provided below:

- “Additional mandatory origin labelling would first of all go against the principle of the Single Market, where food legislation is mainly harmonized, providing equal food safety throughout the EU. It would also be anti-competitive, as products would not compete based on their characteristics or nutritional benefits, but by their origin. It would limit the flexibility of the manufacturers regarding their supply chain when facing shortages or seasonality as it could require a change in labelling, inducing extra costs and increasing packaging wastes, going against the green

aspects of the Farm to Fork strategy. We as a manufacturer, would prefer keeping Option 0 – business as usual.”;

- “Existing Origin Labelling requirements are sufficient.”;
- “Don’t think this is of any real value to consumer – current mandatory origin labelling is too vague. It’s also cost prohibitive as supply can change due to seasonality/ price.”;
- “Mandatory origin labelling works against a common EU market, creates unnecessary costs, and limits flexibility in supply. Especially farmers in border regions are negatively affected.”;
- “This can get complicated, especially if manufacturers use several suppliers of a specific key ingredient. In order to have one correct label, all supply will need to only come from one country.”.

Question 9: Do you believe that additional origin labelling can help consumers make informed food choices?

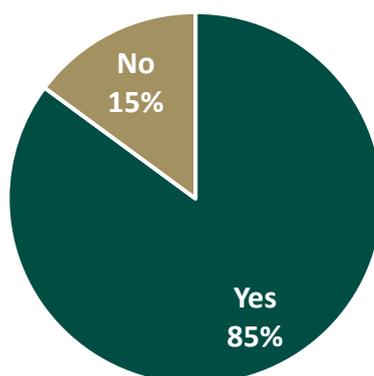


Figure 9: 249 respondents expressed a view regarding the value of additional origin labelling in supporting consumers to make informed choices.

249 respondents answered this question. Of those, 85% (212 respondents) indicated they believed additional origin labelling could help consumers to make informed food choices. The remaining 15% (37 respondents) indicated they did not believe additional origin labelling would be helpful for consumers.

74 respondents who indicated they believed origin labelling supported informed decision making provided a comment to indicate their reasoning, which was a sufficient number to support further analysis. The main reasons provided included:

- The importance of clear identification of country of origin to prevent customers from being confused or misled as to origin, or from making incorrect assumptions in absence of explicit origin labelling (34%; 25 respondents);
- Country of origin labelling can support consumers who want to "buy local" (20%; 15 respondents); and
- Environmental concerns such as the "air/food miles" incurred by products (16%; 12 respondents).

Some of the comments provided by those respondents who indicated they did not believe additional origin labelling can help consumers make informed food choices are listed below:

- "Lets focus on simplification.";
- "I think the current origin labelling allows the consumer to make an informed choice.";
- "The industries where this has the largest impact on consumers already need to specify the COO.";
- "Given the good quality of foodstuffs in the EU, the consumer preference for using them from a country is not based in objective data on quality.";
- "We believe FIC Regulation enables and secures all necessary information is available for the consumer. In fact, country of origin and

place of provenance can be confusing for the consumer who is not familiar to its definitions.”.

Question 10: What would be the preferred geographical level(s) for proposed origin labelling?

Four options were presented, and respondents were allowed to choose more than one:

1. Regional (e.g. naming/labelling the town, country, region);
2. Member State/third country;
3. EU/Non-EU; or
4. A combination of the different levels above.

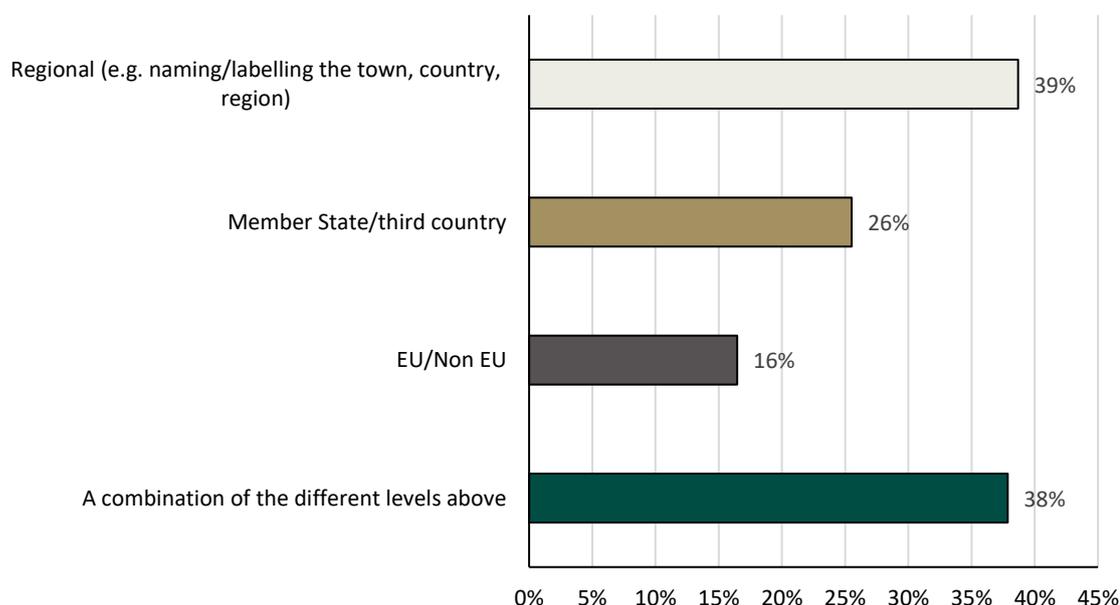


Figure 10: 243 respondents indicated their preferred geographical level for proposed origin labelling. Respondents were allowed to choose more than one option.

243 respondents answered this question. Of those, 39% (94 respondents) selected regional (e.g. naming/labelling the town, country, region) as the best option. 26% (62 respondents) selected Member State/third country labelling. 16% (40 respondents) selected EU/Non-EU labelling. 38% (92 respondents) preferred a combination of these different levels.

The number of comments provided for each of the four options was too low for further analysis.

Some of the comments provided by those respondents who selected the most popular option, i.e., labelling of origin at regional level, are listed below:

- “For example, tomatoes from the Mediterranean part of Spain have better taste than tomatoes from the north of Spain. It is good for the consumer to know the regional origin, in order to learn where the best quality products come from and be able to make their choices.”;
- ““Made in EU” is useless as a provenance and is actively used to mislead. The producer should provide the address of production.”;
- “More information for the consumer.”;
- “Complete transparency is needed, none of this EU/non-EU stuff.”;
- “Knowing the country and the region or the city where the food was produced or it is sourced from would be interesting.”.

Some of the comments provided by those respondents who selected the second most popular option, i.e., nutrient-specific numerical labels (e.g. reference intakes), are listed below:

- “Although preferable to state exact country, I think that EU is a suitable origin where the manufacturer may source from a number of different countries on a seasonal basis. However, 3rd countries should always have the name of the country or countries on BOP [back of pack].”;

- “Due to the individual nature of food brands and the diversity of product categories, flexibility is required in terms of the geographical levels for voluntary origin declarations.”;
- “People may not be familiar with names of various regional areas within and outside the EU. There should be complete transparency.”;
- “If Irish food, I would like to know if I am buying local. If non-Irish, I want to know where it is coming from - and the origin of the main ingredient, not just where it was packed or processed.”;
- “Due to the individual nature of food brands and the diversity of product categories, flexibility is required in terms of the geographical levels for voluntary origin declarations.”.

Question 11: Do you think that visual elements (such as flags, emblems) help consumers to better understand origin labelling and therefore should be included on the label?

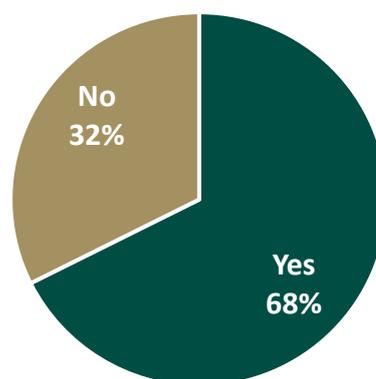


Figure 11: 247 respondents expressed a view on whether visual elements (such as flags, emblems) should be included on a food label in order to help consumers to better understand origin labelling.

247 respondents answered this question. Of those, 68% (167 respondents) indicated they believed that visual elements (such as flags, emblems) help consumers to better understand origin labelling and so should be included on the label. The remaining 32% (80 respondents) did not believe that visual elements should be added to labels.

The number of comments provided for each of the two options was too low for further analysis.

Some of the comments provided by those respondents who indicated they believed visual elements could help consumers to better understand origin labelling are listed below:

- “Flags and emblems can help draw attention.”;
- “Yes, but they should not be allowed to put a flag on if the product has simply been packed in that country.”;
- “Visual is better.”;
- “Visual cues instantly help.”;
- “A flag catches ones attention easily.”.

Some of the comments provided by those respondents who indicated they did not believe visual elements could help consumers to better understand origin labelling are listed below:

- “Currently flags/emblems can give a false sense of security. EU label should mean that the food complies with EU food legislation rather than where it was grown or packaged for example.”;

- “Voluntary origin declarations which include visual elements are already provided for in Regulation (EU) 1169/2011 Food Information to Consumers. If utilised, visual elements should comply with Regulation (EU) 1169/2011, specifically Article 29 which states “the indication of country of origin or place of provenance should be provided in a manner which does not deceive the consumer.” Any initiative to make visual elements compulsory on labels would amount to regulatory over-reach.”;
- “They are a mechanism for deception and should not be allowed.”;
- “Sometimes food that has a flag on the labelling may have been packaged in the country, but was sourced from another.”;
- “In any case the inclusion of visual elements should be voluntary, not mandatory.”.

Question 12: If you think that visual elements should be used on labels, should these be used alone or in combination with text to represent the origin of the food?

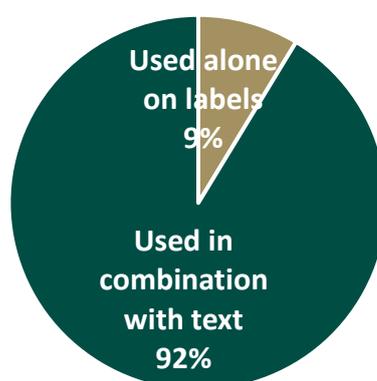


Figure 12: 219 respondents expressed a view on whether visual elements should be included on a food label either alone or with text to represent the origin of the food. This includes one respondent who selected both options and provided a reasoning for doing so.

219 respondents answered this question. Of those, 92% (201 respondents) indicated they thought that visual elements should be used in combination with text. 9% (19 respondents) indicated they thought that visual elements should be used alone, including one respondent who selected both options and provided a reasoning for doing so.

The number of comments provided for each of the two options was too low for further analysis.

Some of the comments provided by those respondents who indicated they thought that visual elements should be used in combination with text are listed below:

- “For clarity within an origin declaration, text would likely be required in addition to any visual element in order to clearly convey to a consumer such information.”;
- “We support icons to help consumers to better understand origin of the food product on a voluntary basis combined with text to avoid any misleading interpretation and mindful of other symbols in used e.g. organic.”;
- “Some visual elements like flags may be more recognizable than others so a combination of both text and labels would be helpful.”;
- “For unequivocal representation as not all consumers are aware of what all the flags represent.”;
- “Need a clear defined labelling system that is different from the abuse happening at the moment. Consumers are confused and don't understand what any visual elements on labels mean.”.

Some of the comments provided by those respondents who indicated they thought that visual elements should be used alone are listed below:

- “The descriptor should be clear and not easily misinterpreted.”;
- “Too much text is off-putting - if have a label that denotes something specific, consumers who care to know can research what these mean and thus have a quick/easy guide to product selection”;
- “It should be as clear and simple as possible. Producers could be given the option to add more info. but not on FoP.”;

- “Don't think they should be used, but if they were, then definitely alone on labels since if they need to be qualified with text their use in the first instance would need to be questioned.”;
- “Visual elements alongside some form of marketing text are beneficial in providing a clear message to consumers for example an Irish flag with produced in Ireland or made in Ireland text alongside provides a really clear message to consumers. However, pack size is limited and the introduction of lengthy text on labels may lead to reducing space for other mandatory information and could make labels more difficult to interpret and take away focus from the critical food safety information.”.

Date Marking

Question 13: Which of the following labelling changes would you like to see for date marking?

Four options were provided, and respondents were able to choose more than one option:

1. No change, i.e., continue with both 'use-by' or 'best-before' dates with some exemptions to foods requiring a date mark;
2. Revise the rules of application of the 'best before' date by extending the list of foods for which a 'best before' date is not required or potentially removing it from foods with long shelf life e.g. rice, pasta, coffee, tea;
3. Revise the rules and abolish the concept of the 'best before' date, keeping only the 'food safety/health' related date (currently expressed as the 'use-by' date); or
4. Improve the expression and presentation of date marking to express the two different types of date marking ('best before' and 'use-by') in order to better differentiate between the food safety/health and quality concepts. This could include alternative wording or graphical content or changes in format, lay-out or colour.

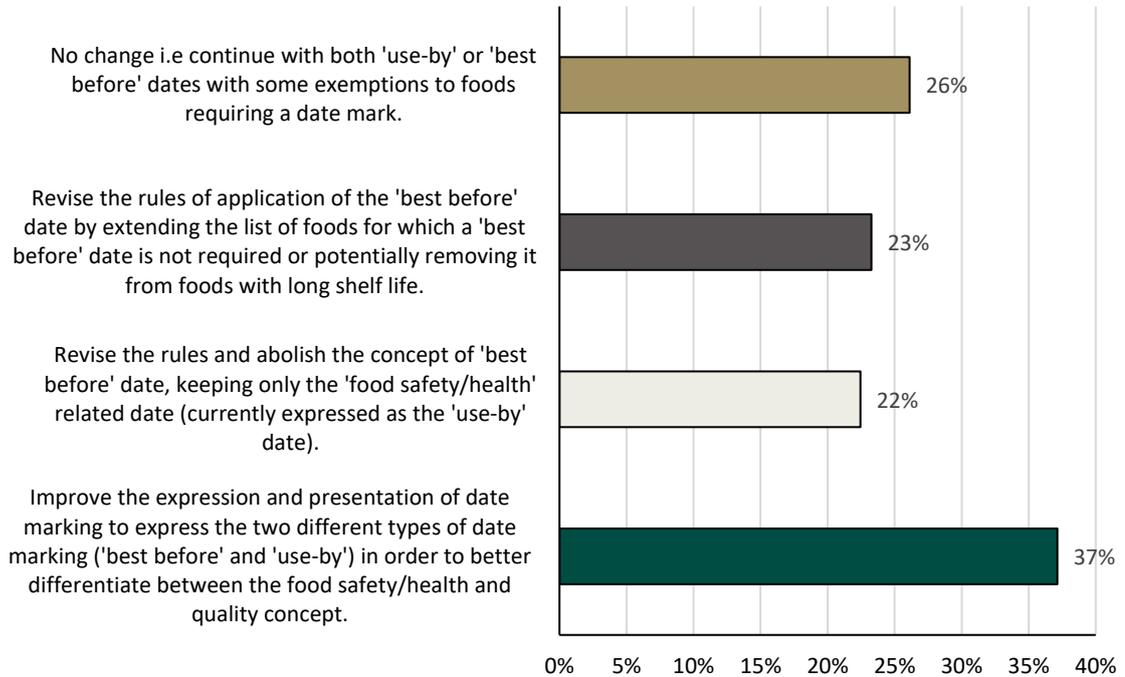


Figure 13: 245 respondents indicated their preferred change to the current date marking requirements. Respondents were able to choose more than one option.

245 respondents answered this question. Of those, 26% (64 respondents) indicated a preference for no change to the current date marking system. 37% (91 respondents) preferred to improve the expression and presentation of date marking in order to better differentiate between the food safety/health (“use-by”) and quality (“best before”) concepts. 23% (57 respondents) preferred to revise the rules of application of the 'best before' date by extending the list of foods for which it is not required, such as removing it from foods with long shelf life e.g. rice, pasta, coffee, tea. 22% (55 respondents) preferred to revise the rules and abolish the ‘best before’ date, keeping only the ‘food safety/health’ related (‘use-by’) date.

The number of comments provided for each of the four options was too low for further analysis.

Some of the comments provided by those respondents who selected the most popular option, i.e., improving the expression and presentation of date marking in order to better differentiate between the food safety/health ('use-by') and quality ('best before') concepts, are listed below:

- "Again clear information is consumer friendly & may lead to less food waste.";
- "This would allow consumers to understand the best before and use by, once nowadays is a bit difficult to identify where these terms are placed on the food packaging.";
- "Correct use of date marking by processors and understanding of terms by consumers is an important factor in managing food waste and [business umbrella organisation] supports a discussion on how this can be improved. Consumer awareness is a critical factor in the effectiveness of any system and must be a key area of reflection and action.";
- "Consumers will have a better experience if they eat the food prior to the 'best before' date and therefore they should be in possession of this information.";
- "The current 'best before' date is being confused with 'use by' date leading to unnecessary food waste. Public health food education is needed.".

Some of the comments provided by those respondents who selected the second most popular option, i.e., no change to the current date marking system, are listed below:

- "Current wording is clear. The emphasis should be put on consumer education. A product with a BB date can still be eaten unless a significant loss in quality (through visual, odour or taste inspection).";
- "We think better consumer education is needed in terms of interpreting the use by/ sell by information provided and what this means in terms of using a product or disposing of it at domestic level.";

- “[Food manufacturer] is seriously motivated to contribute in preventing and reducing food wastage along the value chain, and date marking is considered one of the approaches to act on this issue. [Food manufacturer] is of the opinion that the principle of a safety-based descriptor (“use by”) and a quality-based descriptor (“best before”) are appropriate and should not be changed as such. Date marking and shelf life are provided on the labelling in order to ensure food safety and quality. They are determined by a range of factors which are product- and company-dependent, and as such are the responsibility of the FBO [food business operator]. On an exclusively voluntary basis, we may also support a possibility to improve expression and presentation, if space on the label permits it (e.g. by adding voluntary information to clarify the difference between use by and best before or encourage customers to smell and taste the products before throwing them out once the best-before-date has passed).”;
- “The customer understands the current process.”;
- “I think people do understand the difference between Use By and Best Before and there is no need for change.”.
