POSITION PAPER

“FRONT-OF-PACKAGE LABELLING” (FOPL)

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INTRODUCTION

Food consumption by the European population is not always in line with the health guidelines of the competent authorities and in order to remedy this situation and enable consumers to make healthy food choices, the EU is actively engaged in supporting and encouraging Member States to adopt standards and implement communicative/informative strategies that raise awareness of the importance of a healthy diet, with particular attention to the prevention of excess body weight, obesity, and other non-communicable diseases linked to diet.

Obesity among children, with over 60% overweight and most going on to become overweight adults, represents one of the main problems in Europe and around the world. The health consequences of the correlated pathologies (cardiovascular diseases, cancer, chronic respiratory diseases, metabolic diseases) generate a substantial burden on the health system and other social costs. Among the many contributing causes of obesity and excess weight is the lack of a healthy dietary regime, which is associated with the abandonment of the eating habits of the Euro-Mediterranean tradition (e.g., Mediterranean and Nordic diets).

A reduction in overweight and obesity rates throughout the European Union within 2030 is one of the key objectives of the **EU Farm to Fork strategy ten-year action plan (F2F)** published in May 2020 by the European Commission as part of the European Green New Deal. The plan aims to shift current eating habits towards more sustainable food production and consumption in order to limit climate change, protect the environment, while preserving biodiversity in food and agriculture.

The Commission has identified a form of nutritional “front” labelling of food products (front-of-pack label, or FOPL) located in the main visual field of packages and additional to mandatory nutrition declaration located back of pack. This provides a further instrument (tool) for informing consumers and educating them towards healthier food choices in compliance with articles 35 and 36 of Regulation (EU) 1169/2011 regarding food information to consumers (Food Information to Consumers (FIC) Regulation).

The intention is to make this instrument an integral part of the European “Farm to Fork” strategy (EU Green New Deal) and to facilitate consumers' understanding of the contribution and importance of foodstuffs as regards the energy and nutritional content of diet. A dialogue was initiated (has started) within the EU to verify the possibility of identifying and harmonizing a system as a mandatory FOP model (existing models are voluntary) within the end of 2022.

Likewise, the defining criteria for the **“nutrient profiles”** of foodstuffs, as stipulated in Article 4 of Regulation (EC) 1924/2006, should be defined by the end of 2022, in order to discipline nutritional and health claims, and avoid misleading consumers into using foodstuffs with high fat, sugar, and salt contents. For this purpose, the European Commission requested EFSA to express an opinion within March 2022, to provide the necessary indications for identifying and using nutrient profiles (nutrient profiling).
Mandatory FOP labelling should accurately inform consumers, helping them to make balanced decisions in relation to their overall diet on a daily basis, and avoid the risk of discriminating against individual foodstuffs.

REGULATORY FRAMEWORK FOR STANDARD AND FOP NUTRITIONAL LABELLING

***Regulation (EU) 1169/2011 (known as the FIC Regulation* -** Food Information to Consumers)

The FIC Regulation foresees the voluntary repetition of some information from the nutrition declaration regarding only energy value or energy value accompanied by quantities of fats, saturated fatty acids, sugars, and salt (Article 30, Paragraph 3) on a FOP label. **Pursuant to Article 35** of the regulation, operators in the food sector can use additional forms of expression and/or representation to the nutrition declaration (for example, graphical forms or symbols), and Member States may recommend their use as long as they respect the following requirements as defined in the Regulation itself:

a) they are based on sound and scientifically valid consumer research **and do not mislead the consumer**;
b) their development is the result of consultation with a wide range of stakeholders groups;
c) they aim to facilitate consumer understanding of the contribution or importance **of the food as regards the energy and nutrient content of a diet**;
d) they are supported by scientifically valid evidence of understanding of such forms of expression or presentation by the average consumer. in the case of other forms of expression, they are based on the harmonised reference intakes set out in Annex XIII;
e) they are objective and non-discriminatory;
f) their application does not create obstacles to the free movement of good.

Some FOP systems defined by Member States or operators in the food sector do not fall within the scope of Article 35 of the FIC Regulation, since they do not repeat the information contained in the nutrition declaration but provide details on the overall nutritional quality of the food (for example, with a symbol or a letter). **Article 36 of the FIC Regulation** classifies this as "voluntary information", which nevertheless must comply with the requirements set out in Chapter IV, Sections 2 and 3 (including those reported in Art. 35), and above all it must satisfy the conditions of not misleading consumers, not being ambiguous or confusing, and being founded on relevant scientific data.

If a system communicates an overall positive message (for example, with the colour green), at the same time it must comply with the legal definition of "nutritional claims " because it provides information on the beneficial nutritional quality of a foodstuff according to Regulation (EC) 1924/2006on nutrition and health claims made on foods. According to this Regulation these indications **must not be misleading,** and their use is only permitted **if average consumers can understand the beneficial effects**.

The FOPL systems currently available can be divided into systems based on specific nutrient substances with more or less detailed nutritional information, and systems based on summary indicators providing an overall assessment of the nutritional quality and/or healthiness of a food. The "nutrient specifics" category can represent amounts in numerical form and/or by colour coding. The "summary indicators" class can in turn be subdivided according to the use of "positive indicators" (endorsement logos) for application only on food compliant with specific nutritional criteria, and "scoring indicators", that provide general information on the nutritional quality of a food.

Another category of FOP labelling regards the degree of "orientation/directivity" provided by the system, with indication of specific nutritional benefits for consumers. Other types of classification include "reductive" systems (simplified versions of the nutrient declaration on the back of the packaging), and "interpretative" systems. FOP interpretative systems, based on either specific nutrients or summary indicators, must be based on nutrient profiling models.

Figure 1 summarizes the classification of the main FOP systems/models currently in use.

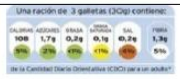
Taxonomies put forward in the literature				FOP system examples	
Labels showing nutrient specific labels	**Numerical**	Non directive	Reductive (non-interpretative)	reference intakes label	
				Nutrlnform Battery	
	Colour- coded	Semi-directive	Evaluative (interpretative)	United Kingdom FOP label	
				Other "traffic lights" labels	
Summary labels	**Positive logos (endorsement logos)**	Directive	Evaluative (interpretative)	Keyhole	
				Heart /Health logos	
				Healthy Choice	
	Graded indicators			Nutri-Score	

Figure 1. FOP nutritional labelling systems and formats (from the "Report from the Commission to the European Parliament and Council regarding the use of forms of expression and presentation additional to the standard nutrition statement", Brussels, 20 May 2020).

Observations reported in Regulation (EC) 1924/2006

(1) An increasing number of foods labelled and advertised in the Community bear nutrition and health claims. In order to ensure a high level of protection for consumers and to facilitate their choice, products put on the market must be safe and adequately labelled. **A varied and balanced diet is a prerequisite for good health and single products have a relative importance in the context of the total diet.**

(10) The application of nutrient profiles as a criterion would aim to avoid a situation where nutrition or health claims mask the overall nutritional status of a food product, which could mislead consumers when trying to make healthy choices in the context of a balanced diet. Nutrient profiles as provided for in this Regulation would be intended for the sole purpose of governing the circumstances in which claims may be made. **They should be based on generally accepted scientific data relative to the relationship between diet and health. However, profiles should also allow for product innovation and should take into account the variability of dietary habits and traditions, and the fact that individual products may have an important role in the context of an overall diet.**

(11) The establishment of nutrient profiles should take into account the content of different nutrients and substances with a nutritional or physiological effect, in particular those such as fat, saturated fat, trans-fatty acids, salt/sodium and sugars, excessive intakes of which in the overall diet are not recommended, as well as poly- and mono-unsaturated fats, available carbohydrates other than sugars, vitamins, minerals, protein and fibre. **When setting the nutrient profiles, the different categories of foods and the place and role of these foods in the overall diet should be taken into account. Exemptions from the requirement to respect established nutrient profiles may be necessary for certain foods or categories of foods depending on their role and importance in the diet of the population.** These would be complex technical tasks and the adoption of the relevant measures should be entrusted to the Commission, taking into account the advice of the European Food Safety Authority.

(15) **It is important that consumers understand indications regarding foodstuffs, and it is important to shield consumers from misleading information.** The Court of Justice of the European Community considered it necessary, when ruling in disputes regarding advertising after the implementation of Council Directive 84/450/EEC of 10 September 1984 regarding misleading and comparative advertising (2), to assess the effect on a virtual typical consumer**. In line with the principle of proportionality, and to enable the effective implementation of the protective measures that it provides for, the present Regulation adopts the parameter of the average consumer, informed to a normal degree and reasonably perceptive and prudent, also taking social, cultural, and linguistic factors into account, as defined by the European Court of Justice. It is important that claims on foods can be understood by the consumer, and it is appropriate to protect all consumers from misleading claims.** However, since the enactment of Council Directive 84/450/EEC of 10 September 1984 concerning misleading and comparative advertising (2), the Court of Justice of the European Communities has found it necessary in adjudicating on advertising cases to examine the effect on a notional, typical consumer. **In line with the principle of proportionality, and to enable the effective application of the protective measures contained in it, this Regulation takes as a benchmark the average consumer, who is reasonably well-informed and reasonably observant and circumspect, taking into account social, cultural and linguistic factors, as interpreted by the Court of Justice.**

FOPL and nutrient profiles: Scientific opinion EFSA 24 March 2022

Defining a nutrient profile involves classification of foods according to their nutritional composition and applying predefined criteria. The majority of FOP systems are based on criteria of nutritional profiling, like for example simple nutritional thresholds designed to identify whether the colour green, yellow-orange, or red is assigned, or more complex algorithms that generate an integrated score.

Profiling criteria can be applied without distinction to all types of food or be specific for certain dietary categories.

On 24 March 2022, EFSA expressed the following conclusions (drafted on specific request of the European Commission) regarding nutrient profiling for the development of harmonized mandatory front-of-food package labelling, and for the definition of profile nutrients to limit nutritional and health indications on foodstuffs:

- Food groups with important and specific dietary roles in European diets include starchy foods (cereals and potatoes), fruits and vegetables, legumes and pulses, milk and dairy products, meat and meat products, fish and shellfish and products thereof, nuts and seeds, and non-alcoholic beverages, as recognised in FBDGs in Member States. **The dietary roles of these food groups and their relative contribution to the overall diet may vary across individual countries owing to the variability of dietary habits and traditions.**
- Dietary recommendations made in FBDGs by EU Member States **reflect the available evidence on the consumption (frequency and amount) of certain food groups and their relationship with chronic disease risk**. Consumption of whole grains, fruits and vegetables, nuts and seeds, fat-reduced milk and dairy products, fish and water is encouraged, whereas food products high in SFAs, sugars and/or sodium owing to food processing are generally discouraged, even within these food categories. FBDGs also encourage regular consumption of legumes and pulses partially replacing meat (particularly red meat and processed meat), and the consumption of vegetable oils rich in *cis*-MUFAs (monounsaturated fatty acid) and *cis*-PUFAs (polyunsaturated fatty acids) instead of fats high in SFAs (saturated fatty acids).
- Dietary intakes of SFAs, sodium and added/free sugars are above current dietary recommendations in a majority of European populations; excess intakes of these nutrients are associated with adverse health effects, and therefore, they could be considered for inclusion in nutrient-profiling models based on their public health importance for European populations.
- Energy could be included in nutrient-profiling models because a decrease in energy intake is of public health importance for European populations; in food group/category-based nutrient profiling models, total fat could replace energy owing to its high-energy density in most food groups, while the energy density of food groups with low or no fat content (e.g. water-based non-alcoholic beverages, jams and marmalades) may be well accounted for by the inclusion of(added/free) sugars in the model.
- Dietary protein is required to support tissue growth during childhood and adolescence and maintain muscle mass and function during adulthood and in old age. **Average protein intakes in Europe are above the PRI (Population Reference Intake) in most population groups**

and countries, and no beneficial effects on muscle mass or function can be expected from increasing protein intakes further.

- . Intakes of dietary fibre and potassium are below current dietary recommendations in a majority of European adult populations; inadequate intakes of dietary fibre and potassium are associated with adverse health effects, and therefore, dietary fibre and potassium could be considered for inclusion in nutrient-profiling models based on their public health importance for European populations.
- Dietary intakes of iron, calcium, vitamin D, folate and iodine are below current dietary recommendations in specific subgroups of European populations only. Whereas dietary modifications alone may not be sufficient (or appropriate) to fulfil the nutrient requirements, **some foods/food groups make important contributions to their intake (e.g., milk and dairy products for calcium, meat and meat products for iron; fortified foods such as breakfast cereals for folate).** Inadequate intakes of these nutrients are usually addressed by national nutrition policies in Member States and/or individual advice.
- Some nutrients may be included in nutrient-profiling models for reasons other than their public health importance, e.g., as a proxy for other nutrients of public health importance, or to allow for a better discrimination of foods within the same food category.

The agency also underlined the importance of diet for the health of citizens when stating that: "*The nutrient profile of the overall (habitual) diet is an important determinant of health and the nutrient profile of a nutritionally adequate diet is defined by science-based recommendations for intakes of energy and nutrients (i.e., Dietary Reference Values (DRVs))". "Because diets are composed of multiple foods, overall dietary balance may be achieved through complementation of foods with different nutrient profiles, so that it is not necessary for individual foods to match the nutrient profile of a nutritionally adequate diet. Nevertheless, individual foods might influence the nutrient profile of the overall diet, depending on the nutrient profile of the particular food and its intake, in terms of frequency and amount".* (pp. 7 and 4).

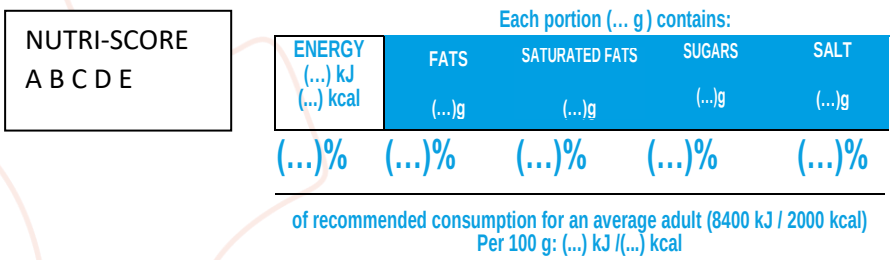
Guidelines for a healthy diet drafted by the CREA (Italian Centre for Food and Nutritional Research) (2018 edition)

The guidelines for a healthy diet stipulate that there is no single "complete" food that on its own contains all the substances in the right quantities to satisfy our nutritional needs. For this reason, for an adequate and balanced diet it is essential to combine different foods, each with distinct nutritional characteristics, to ensure all the necessary nutritional elements along with an adequate amount of energy (based on the dietary model typical of the Mediterranean diet). Apart from cases of intolerance or allergies, no food should be excluded from a correct diet (a term derived from the Greek διαιτα, which means habit, way of living, rule) and in particular from the model of the Mediterranean diet, which is capable of preventing numerous chronic diseases and promoting extended longevity while also respecting the hedonistic/sensorial and socializing dimensions of eating.

Description of two FOP models examined by the EU in the selection for a harmonized and mandatory model: Nutri-Score and NutrInform Battery

Nutri-Score summarizes the nutritional quality of a foodstuff using two correlated scales: one chromatic and divided into five graduations from green to red, and one alphabetic with letters from A (highest quality) to E (Figure 2). Food products are divided into five categories on the basis of a score calculated using a complex algorithm that generates a total for the "unfavourable" elements (energy in kJ, saturated fatty acids, simple sugars, sodium, with scores ranging from 0 to 10 for each of the 4 factors), and then subtracts the values of the "favourable" elements (percentages of fruit/vegetables/legumes/dried fruit, fibre, and protein, with scores ranging from 0 to 5 for each of the 3 factors). Foods with very low scores are assigned to category A (green) and those with the highest scores are assigned to category E (red). The score always refers to 100 g or 100 ml of product. In France, the rules of use and calculation criteria for a Nutri-Score are regulated only for 4 food categories: solids, liquids, seasoning fats, and cheese, by two decrees of the French Ministry of Health of 19 July 2016, and 31 October 2017.

NutrInform Battery was established in Italy with the decree of 19 November 2020 by the Ministry of Health, the Ministry of Economic Development, and the Ministry of Agricultural, Food and Forestry Policies (Official Gazette 304 of 7/12/2020). It is based on effective portions and indicates the quantity of nutrients per 100 g (Figure 2). It displays some information already present in the nutrition declaration, but in graphic and numeric form on the front of packages. This might be just energy value, or the same accompanied with the quantities of fats, saturated fatty acids, sugars, and salt. The nutritional information is displayed in graphic form with a series of boxes and below these "battery" icons. The boxes list the 4 nutrients that need to be limited in consumption: fats, saturated fats, sugars, and salt. The battery icons show the percentage of energy in fats, saturated fats, sugars, and salt consumed in a single portion relative to the recommended daily intake (according to Reg. EU 1169/2011). The charge level of the battery provides a graphic indication of the percentage of energy and nutrients contained in a single portion for easy visual quantification. In a balanced daily diet, the total energy/nutrients consumed must not exceed 100% of the recommended daily intake (see https://www.nutrinformbattery.it/).



OBSERVATIONS

On the basis of the information presented above, it is sustained that the FOP summary labelling systems (with reference in particular to **Nutri-Score**) are not appropriate for use as mandatory models for harmonization on a European level for the following reasons:

- They do not comply with Art. 35 Reg. EU 1169/2011 (with reference in particular to the requirements of points c), e), f), g), e)), nor with Art. 36 of the same Regulation as regards the importance of not misleading consumers and not being ambiguous or confusing to consumers.

- They do not comply with the most recent nutrient profiling method proposed by EFSA since they do not reflect the indications it provides (protein content is scored positively while this is not considered relevant by EFSA, potassium and certain other food categories like wholemeal cereals are absent). It also does not take into account the **variability of eating habits and traditions in the various EU countries nor of different modes of consumption (frequency, quantity).** Europe cannot be considered as a homogenous dietary culture since there are obvious differences not only between countries but even on a regional/local scale as regards eating preferences, habits, and dietary behaviour.

- Assessment is given only for 100 g of product, without considering the effective quantities and frequencies of normal consumption. A score generated for 100 g can skew the information since there is no indication of how this quantity relates to normal consumption and daily nutritional needs.

- The colour/letter scale could encourage belief in a direct correlation between foodstuffs and health, potentially leading the **average consumer** to consider a product - only because marked with the colour green or the letter A - as most appropriate for their health/condition and preferable to other foodstuffs outside this category.

- They are based on complex algorithm incomprehensible and hard to explain to average consumers, even if founded on a scientific basis. The reference scale for the score/thresholds of the positive and negative aspects is discretional and arbitrary, having been defined by a group of essentially single-discipline experts, without the validation of EFSA and a multidisciplinary scientific community. They are thus vulnerable to manipulation/exploitation/bias (of a geographic, political, cultural, lobbying, scientific, or emotional nature).

Specific rules are applied for certain products (and in many cases arbitrarily correlated/associated by the group of "experts" who manage the algorithm) in exemption to the general criteria, without this being made clear on the label applied to the packaging (extra-virgin olive oil (EVO) is an example, which together with other oils (rapeseed/ walnut including refined) are awarded higher scores than any other oils on the basis of arbitrary suppositions applied by the group of experts).

- The reformulation of products is conducted with a distorted/opportunistic approach with the sole purpose of achieving better colour/letter positioning on the basis of the adopted thresholds and algorithmic scales. This approach would exclude in advance reformulation for the majority of traditional products, certified for their specific character and obliged to respect certain "traditions" during production. The cultivation of raw materials and local ingredients, mainly used in the production of traditional foodstuffs, significantly contributes to the

- development of a more sustainable environment, supports short production chains, and helps protect rural areas from depopulation, while also ensuring a wider variety of food choice for consumers.

- They imply the achievement of positive nutritional/health results through a single unchanging food/diet, and do not raise consumer awareness of the value of other foods or improve their eating habits.

- The colour/letter coding awarded to a product could contradict its nutritional and health claims (Reg. EU 432/2012) due to the quantities consumed in the diet (portions and frequency of consumption).

- They do not promote/implement the Mediterranean and Nordic diets (acknowledged worldwide for their health benefits) characterized by a varied and balanced range of foods modulated in quantity and frequency of consumption.

- The summary graphic and colour representation (green/A = healthy food – red/E unhealthy food) provides an absolute assessment of a product decontextualized from the real needs of individuals (lifestyles) and overall diet (interactions with other foods consumed). Such summary and superficial information can be incomplete or misleading for the informed decision making of consumers.

- They can be exploited for misinforming and skewing the market to the extent that the FOP Nutri-Score labelling system has come to the attention of the Italian Competition Authority (AGCM), who initiated and completed a preliminary procedure pursuant to Art. 6 of the Regulation of preliminary procedures regarding misleading advertising (because it infringes Arts. 20, 21 point b, and 22 of the Consumer Code).

- They are not compliant/aligned with the Guidelines for healthy eating drafted by the Italian Centre for Food and Nutritional Research (CREA) in 2018, according to which no foodstuff can be depicted as a universal ideal solution. It is regular consumption of a combination of different foods that makes a diet more or less healthy.

- They excessively simplify the value of a particular foodstuff, which is not presented to consumers as a component of an overall personalized diet that must satisfy nutritional, cultural, social, economic, religious, and ethnic requirements, as well as the specific needs of individual consumers, including the hedonistic, sensorial, and socializing aspects.

- They are not educational/informative/training systems because they do not enable consumers to make well informed decisions. Instead, they are directive models that “induce” prescriptive unreasoned choices (consumers understood as subjects of a dietary “regime” rather than enjoying dietary “free will”). They also fail to follow the definition of an **average consumer,** “informed to a normal degree and reasonably perceptive and prudent”.

CONCLUSIONS

Harmonization of FOP nutritional labelling is desirable in order to provide consumers with consistent information, without misleading them about the nutritional properties of foods that - instead - need to be contextualized within a varied and balanced diet. FOP harmonized labelling could be made mandatory only on the condition that it complies with the basic principles of the current EU regulations and provides accurate information for consumers.

Nutri-Score and similar systems are not appropriate for adoption as harmonized and mandatory systems since they do not comply with Articles 35 and 36 of EU Regulation 1169/2011, and do not respect the general concept of a healthy diet (comprising diverse foodstuffs consumed in different quantities and frequencies, like in the Mediterranean and Nordic diets), also in relation to the diverse food cultures in the EU. The adoption of this type of FOPL model would be like equating human nutrition with that of animal feeds. The latter are based on a constant/unifeed ration (quantity and composition) of balanced ingredients/components for the dietary-nutritional needs of each different animal species, mixed in a way that prevents the animal from being able to choose what to eat from the various components in their food ration.

A recently proposed compromise solution can also not be considered adequate. This involves modifying the algorithm to avoid mono-ingredient products (like olive oil) being classified negatively. This represents a form of acknowledgement for countries in southern Europe, but it also demonstrates the structural and scientific inadequacy of an algorithm that can be adapted according to momentary special political and marketing interests. The proposed exclusion of PDO/PGI products from application of FOP labelling, and the justification that colour/letter comparisons must be applied exclusively between products of the same category, can likewise be considered a form of manipulation.

It would instead be desirable to adopt an FOP system with labels showing nutrient specific information (informative/educational in content rather than interpretive/evaluative/directive), in line with EC Regulations 1169/2011 and 1924/2006, and above all appropriate for the promotion of the vast Euro-Mediterranean gastronomic heritage (the Mediterranean diet does not reformulate/restructure single foodstuffs to make them compliant with the target values of an algorithm, but combines different foodstuffs in an appropriate manner, including gastronomic preparations and recipes that use leftovers and waste materials), while also taking into account the sensorial/hedonistic, and socializing aspects.

Therefore, if a harmonized mandatory FOPL model was to be proposed on a European level, it is recommended to only use models compliant with Article 35 of the EU Regulation 1169/2011, and in line with the concept of a healthy diet, like the informative/educational systems, among which the **NutrInform Battery**.

These systems make it possible to: i) promote accurate information that does not mislead consumers, providing appropriate instruments to make informed decisions and follow a healthy, varied, balanced, and sustainable dietary model, ii) avoid the crude “healthy/unhealthy food” dichotomy, encouraging more astute decision making focused on achieving an appropriate combination of different foodstuffs, consumed in the right (pro)portions as part of a balanced and varied diet, iii) comply with regulations

as regards nutritional labelling/profiling and the policies for promoting dietary education adopted across the world, iv) pursue a “virtuous” rather than “opportunistic” reformulation of foodstuffs (not necessary for traditional foods) and provide useful indications for the formulation of new foods.

The NutrInform Battery takes into account the **daily requirements** for nutrients, encouraging consumers to choose a healthy, varied, and balanced diet. It is designed to give summary but clear information about the presence of certain nutrients that lend the food value as part of a varied and balanced diet, capable of preventing, in an effective and scientifically valid way, obesity and the associated health risks. A system that focuses on the consumer takes advantage of the **critical capacity** of citizens and defends the unique heritage of the **Mediterranean diet**.

The NutrInform Battery therefore emerges as a valid alternative to Nutri-Score when looking for a harmonized European food labelling system that promotes dietary wellbeing. If the NutrInform model is not selected it would be opportune to propose a new and alternative FOP labelling model founded on a solid scientific basis, and that takes into account the individual diets and eating habits in the Member States, while promoting those unanimously acknowledged as healthiest (e.g., the Mediterranean and Nordic diets), and avoiding systems based on scores, even if referenced against individual portions.
It is recommended, finally, in order to maintain a united position for the entire Italian food and agriculture system on this issue, it is important to include the various actors in the agri-food chain in FOPL consultation discussions (ranging from doctors and nutrition biologists to experts in primary production, food science and technology, food law, representatives of trade associations including consumer and LOD associations, along with the various information agencies).

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