## **European Dairy Association views on EU labelling issues**

he European Dairy Association (EDA), representing the European dairy industry, has addressed concerns with respect to origin labelling, nutrition labelling, trans fatty acids labelling, allergen labelling and the labelling of imitation products that need to be looked at.

EDA is not in favour of mandatory origin labelling and therefore rejects the European Parliament's request for the mandatory origin labelling for milk and dairy products without carrying out an impact assessment first.

As composition and quality of milk in the EU is defined by EU legislation, there is no reason for mandatory origin labelling within the EU for food safety and nutrition considerations. Also, milk used for the production of dairy products can be from different origins from one day to another and it would

be difficult and expensive to change the label each time these origins change.

In this respect, EDA agrees with the Council 1st reading position that foresees a thorough feasibility check before taking any further decisions.

When it comes to nutrition labelling, EDA supports the Council's approach that the nutrition declaration is gathered in the 'same field of vision', that is either on the back or the side of the pack, without specifying the exact location. This provides at-a-glance information of the overall nutritional composition of foods.

The EDA shares with the EU Parliament the view that front-of-pack labelling should be allowed on a voluntary basis. Labelling of trans fatty acids (TFA) should remain voluntary and the EDA rejects the Parliament's request for mandatory labelling of TFA

because average total TFA intake in Europe is not a public health concern.

EDA therefore supports the Council 1st reading position and the Commission's view to allow TFA labelling on a voluntary basis.

If TFA labelling becomes mandatory, then EDA calls for an exemption of naturally occurring TFA as present in milk and dairy products. The WHO says that there is no scientific evidence that, at usual levels of consumption, the intake of naturally occurring TFA has any negative effects on heart health.

The declaration of allergens is of key importance for food safety. However, EDA questions whether the repetition of allergens in the ingredients lists contributes to better consumer information and therefore supports the EU Parliament's request for deletion of repetitive allergen labelling.

The concept of 'contains' labelling close to the ingredients list (without repetition in the ingredient list) is a novel approach. It has to be ensured that in the absence of an ingredients list, the location of the 'contains' labelling is at the discretion of the food business operator.

In addition, the EDA supports the Council Ist reading position which retains the exemption from allergen labelling in cases where the name of the food clearly refers to the substance or product concerned (for example milk).

Finally, the EDA supports maintaining the existing legislative framework for the designation of foods relating to imitation products, and rejects any additional definition and mandatory labelling of food imitation products. It therefore clearly supports the Council 1st reading position to clarify the provision of fair information practices regarding imitation products.

"The European Dairy Association is in favour of a simplification and harmonisation of European labelling rules," Joop Kleibeuker, Secretary General of EDA told International Dairy Topics.

"In this respect we can only regret that the proposed regulation is making the requirements even more complex. We also believe that, although a clear and relevant information on food is necessary, a healthy lifestyle is not only determined by consistent information. In our view, a healthy lifestyle is also determined by educational efforts on nutrition and balanced eating habits combined with sufficient physical activity."