



Reaction on Product Improvement Action plan for (spreadable) Fats

MVO reaction – April 2021

The Oils and Fats Industry in the Netherlands has taken notice of the Government concept plans for the product improvement of the (spreadable) fats product group as was presented in the 'RIVM Concept rapport DEEL2 - criteria productverbetering 20200219' and annexes. MVO thanks the government for the possibility to respond on the proposal.

MVO hereby reacts on behalf of the sector. The sector has contributed to public health through reformulation in the past and we are willing to play our part in improving public health, as was already mentioned in an [earlier reaction](#) on the product improvement program for product groups in general. Through the Task Force responsible Fatty Acid Composition and through other activities such as the Campaign Responsible Frying, the fatty acid composition of our products has already improved over the years. The formation of industrial trans fatty acids has declined significantly in the past decades without increasing the amount of SAFA, due to voluntary action by our members.

Consumer perspective on nutrition

The challenge of improving nutrition must be understood from a consumer perspective. Considering that they select products based on price, taste and functionality, for the purpose of the reformulation strategy, products having equivalent or same functionality must be addressed as a single category even if origin and composition are different. Specifically, butter, and margarine and spreads have equivalent function in the kitchen and so should be addressed together. It is not credible from a nutrition and scientific point of view to pursue the goal of improving public health by driving for reduction in saturated fat and trans fat content in margarine and spreads, without similar, equivalent goals for butter.

Margarines and spreads (containing essential mono- and poly-unsaturated fatty acids and <1% TFA) are already recognized as a healthier alternative to full-fat dairy products (more SAFA and TFA), a fact that is reinforced in the national dietary recommendations, 'De Schijf van Vijf'.

The soft and liquid versions of margarine products should be eaten every day, in quantities that most of the consumers do not currently meet.

Therefore, the sector likes to stress that reformulation has its limits. Consumers choose products based on taste and functionality. If reformulation leads to a change in taste and / or functionality, consumers may choose less healthy, high SAFA products e.g Butter. This will defeat the purpose of the reformulation initiative. Additionally, just reformulating margarine spreads and cookingfats to decrease SAFA levels leaves no option for vegan and vegetarians who want to choose products with similar functionality as butter but without animal ingredients. Besides this, the functionality of products such as melting behavior and baking properties may no longer be guaranteed.

Educational Program

Reformulation may require use of innovative techniques which may not be readily accepted by the consumer. Where reformulation is possible, it should be supported by government sponsored consumer education initiatives focused on benefits of the reformulation technique. The education initiative should also discuss the negative health effects of high SAFA products such as butter. **Reformulation therefore needs an extensive educational program.** Hence an extensive educational program is needed because reformulation alone is not enough to change consumer behavior towards a healthier diet. Together we should start up communication and education to really make the difference in preventing overweight and non-communicable diseases.

The reaction on the product group level

The product group concerned contains: fat spreads, cooking fats (including baking fats and frying fats), in Dutch 'smeer- en bereidingsvetten'. The sector appreciates the fact that the products are now divided into two subgroups and are no longer all in one group as was the case in the draft action plan.

Tabel 3.3 Percentage verzadigd vet t.o.v. totaal vet per voedingsmiddelengroep en het maximumgehalte uit de AVP-afspraken.

Voedingsmiddelengroep	Aantal (N)	Verzadigd vet / totaal vet (%)						AVP max
		Bijdrage aan inname van verzadigd vet (%)	P2,5	P25	P50	P75	P97,5	
Smeer- en bereidingsvetten	397	n.b.	10	18	31	59	70	
Smeersels voor op brood	230	7,0	20	28	53	65	71	
Bereidingsvetten (excl. olie)	167	3,5	9	11	16	34	51	

Based on the limited information currently available, the sector views the targets for subgroup 1 (spreads) as ambitious.

➔ *Question: in the first report there was only one target for 2030. Is it correct that in the current report there is the mentioning of two targets?*

The targets for subgroup 2 (cooking/baking/frying fats) are not realistic. Additionally, it is unclear which products are included in this subgroup. Based on the above table it is unclear which SKU's are included under the category of "Bereidingsvetten" The MVO requests for the products to be identified by brand name and category.

LED A

This action plan contains ~100 SKUs less than the previous draft action plan. The MVO has the following questions:

- which products specifically are taken into account per subgroup?
- How many SKUs are there per product?
- Does the database contain import or export products?

Only when we have more information on listings per subgroup we will be able to react and comment on the achievability and ambitiousness of the targets. **Therefore, we urgently request for an overview of the SKU's listed in the 2018 LED A database.** To be able to follow up on the achievements we would need to have this insight on a regular basis, for instance via reading access. At the moment the RIVM report makes use of LED A 2018, and updates from LED A 2020 are still expected. Does this mean that there can be a delay of 3 years in the actual product data?

Incentives

We would like to remind the government of our previous remarks regarding “[Nutriscore](#)” - under the current rules, it is not possible for any products in our category to score better than “C”, so consumers will not readily notice the improvement efforts we have made. Thus, we remind you of the importance of adapting the Nutriscore scoring rules as we previously recommended and of the fact that the Nutri Score logo with the current algorithm does not act as an incentive for our products and of the fact that a special reformulation claim might be a good alternative incentive.

Furthermore, the consequences of ‘naming and shaming’ do not have the positive effect intended by the government. “Naming” does not stimulate consumers to buy the products with a new – healthier-recipe. Consumers choose products based on “taste” and “functionality”. Government “naming” of these products will make the consumers perceive these products as “less tasty” and not delivering on the functionality. Additionally, naming and shaming, may not stimulate FBO’s who lack resources for R&D to reformulate, instead they might become demotivated.

Effect on public health

Furthermore we like to stress that **the effect of reformulation** largely dependent on whether consumers stay with the reformulated products, or whether they switch to the less reformulated products, offering the original palatability and/or functionality. Therefore, monitoring on the basis of sales data is essential to be able to identify the effect of the reformulation on public health. Monitoring on the basis of consumption data is only possible once every 5 years (and based on the SKU-data once every 3 years?), we urge the government to come up with a solution. The MVO sector is willing to deliver the yearly ratio SAFA/Total Fat in the products listed per subgroup per step 1-4 aggregated over all companies if other sectors for e.g dairy / butter are also willing to share this data.