



Brussels, 27 August 2007

Dear Sir or Madam,

Following your public request for comments, we would like to take the opportunity to inform the FDA about our Choices Programme.

The Choices Programme is an international initiative of food industry to help consumers make healthier choices when buying food. The essence of the Choices Programme is a front-of-pack stamp on products that pass an evaluation against qualifying criteria, based on international dietary guidelines. An independent Scientific Committee is responsible for designing and periodically reviewing the qualifying criteria.

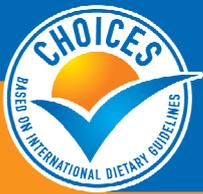
The Choices stamp has two distinct effects: it helps consumers in the quick moment of decision to choose the healthier product, and it stimulates food companies to improve the composition of their products in order to obtain a Choices stamp.

We firmly believe that this initiative is a valuable contribution to counter the increase in obesity and diet related diseases, as called for by the World Health Organization and many national and international authorities around the world.

Unique characteristics

As compared to other systems that have been proposed, the Choices Programme has a number of specific advantages:

- It is *simple* - One positive stamp on healthier products makes it easy for the consumer to make a healthier choice in a split second, without having to understand the detailed information on the label.
- It is *credible* - The qualifying criteria were derived on the basis of World Health Organization dietary recommendations. This has been done by independent scientific committees in the Netherlands and Belgium, made up by leading scientists in nutrition and food technology. An international scientific committee with independent scientists from all over the world is now being set up, that will periodically review the criteria and adapt them to the latest scientific insights and technological developments.
- It is *globally applicable* - The criteria are applicable to all categories of food and beverages (excluding alcoholic beverages, infant food and products prescribed under medical supervision). As they were derived from international guidelines, they are in principle valid in all countries – although in some instances adaptations may be needed due to national regulations and dietary recommendations.



CHOICES INTERNATIONAL FOUNDATION

- It is *open to all companies* - The programme is governed by the Choices International Foundation, putting in place national foundations in countries where the programme is implemented. All companies from food industry, retail and catering can participate.
- It is a *good opportunity for industry* - With the clear understanding that the qualifying criteria are designed by independent scientists, the programme fits in well with the strategy of those companies that want to play a responsible role in the field of nutrition and health.

Scientific basis

The effectiveness of different formats of front-of-pack labelling systems has been investigated in four countries. Enclosed you find the abstract of the article on this research, published in the scientific journal *Appetite*. The results show that consumers largely appreciate front-of-pack labelling and intend to make use of it. It also shows that simple labels take less time for the consumer to evaluate, making them more appropriate for the shopping environment.

The 2003 Joint WHO/FAO Expert Consultation on *Diet, Nutrition and the Prevention of Chronic Diseases* recommends maximum levels of intake of four key nutrients that have been shown to have a proven negative impact on health: salt (sodium), sugar, saturated fatty acids and trans-fatty acids.

This has been the starting point for the scientific committees in the Netherlands and Belgium in developing the qualifying criteria, taking into account as well the importance of sufficient intake of dietary fibre and appropriate levels of energy intake. The potential effects on daily intake of nutrients have been assessed on the basis of food consumption data in the Netherlands.

Enclosed you find a document presenting the qualifying criteria. It is important to note that these will be periodically reviewed and updated by an international committee of independent nutritionists and food technologists, chaired by Prof. Jaap Seidell of the VU University in Amsterdam.

Also enclosed is the dietary validation.

Global implementation

Three multinational food companies established the Choices International Foundation: Friesland Foods (in Malaysia: Dutch Lady), Unilever and Campina. At the national level many more companies participate.

Globally the Choices Programme has been introduced in 20 countries, four of which already have multiple participating companies (The Netherlands, Czech Republic & Slovakia, Poland and Belgium). In the Netherlands, where the programme has been running since just over a year, already 65 companies participate and around 1000 products carry a Choices stamp. On the short term we plan to start up the programme in many more countries on all continents.



CHOICES INTERNATIONAL FOUNDATION

Sharing information on the Choices Programme

The Choices International Foundation sees it as a priority to discuss the plans and challenges related to front-of-pack labelling with all interested parties. If you have any further questions, please contact the secretary of the Foundation, Jup van 't Veld, at secr@choicesinternational.org.

Respectfully yours,

Cees 't Hart
Chairman
Choices International Board

Jaap Seidell
Chairman
Choices Scientific Committee

Enclosures:

- Response to FDA's questions
- Feunekes et al.: "Front-of-pack nutrition labelling: Testing effectiveness of different nutrition labelling formats front-of-pack in four European countries", *Appetite*.
- Qualifying criteria for the Choices stamp.
- Dietary validation.