



RECOMMENDED USE OF CHOICES INTERNATIONAL MULTI-LEVEL CRITERIA

Introduction

Encouraged by WHO and other international organizations, an increasing number of countries is preparing and implementing measures to improve consumer food choices by means of a variety of food system actions: various forms of FOP labelling, taxation, limitation of marketing to children, standards for product reformulation, food purchasing standards, school feeding standards etc.

In July 2020 we announced our new strategy, shifting focus from industry to governments and from a positive logo to coherent sets of food system actions. The final goal of these food system actions is to improve public and consumer health by encouraging the consumption of healthier foods and decrease the consumption of the least healthy foods.

To support multiple food system actions coherently, we have asked our International Scientific Committee to extend the Logo Criteria to a multi-level system of criteria that classify food products in five levels of healthiness. Based on the same principles that we have used to develop and adapt our logo criteria, the Choices International Scientific Committee is working on this and expects to publish the methodology and resulting multi-level criteria (MLC) in the second half of 2021.

Whilst the methodology and resulting criteria is the mandate of our International Scientific Committee and is work in progress, the terms of reference and intended application of these multi-level criteria have been agreed by the Board of Choices.

Criteria principles

Choices uses the following principles to its criteria:

Development and governance process

- **Science based:** the quality of the criteria has to be as high as possible and the criteria should be as credible as possible by being based on current scientific consensus unbiased by specific interests from business or politics. The criteria are determined by a standing International Scientific Committee (ISC) made up of leading independent scientists. This Committee is responsible for the scientific quality of the international criteria. including the regular 4-year review process.
- **Dynamic:** the criteria will be updated regularly as a result of 4-year review process by the ISC.
- **Realistic:** the criteria differentiate among products currently present in markets

Components

- **Nutrients related to NCDs:** the criteria only include nutrients for which consumption is related with the risk of non-communicable diseases (NCDs). Currently these are energy,



saturated fat, trans fat, total sugar, added sugar, sodium/salt as disqualifying components and fiber as qualifying component.

- **Nutrients related to undernutrition and micronutrient deficiencies:** At regional or national level nutrients related to undernutrition and/or micronutrient deficiencies maybe included.

Methodology

- **Unit of measure:** the criteria use per 100g/100 ml as standard unit of measure, as serving size is not well defined and standardized
- **Threshold:** the criteria provide thresholds to which all nutrients need to comply rather than a scoring algorithm. This makes the criteria easier to extend or to adapt to national context and more transparent than algorithm based profiling systems.
- **Complete:** the criteria cover all food groups
- **Directive:** the criteria indicate the 'healthiness' of a product without leaving interpretation to the user.
- **Differentiation within food groups:** the criteria are food group specific, which makes it easier to differentiate within a food group.
- **Differentiation between food groups:** the criteria differentiate between basic- (part of dietary recommendations) and non-basic (not part of dietary recommendations) food groups in the choice of key nutrients. In basic-food groups, both nutrients to limit and nutrients to stimulate are considered, in non-basic food groups only nutrients to limit.
- **Synergistic:** the same set of criteria can be used to substantiate different nutrition policies, encouraging consumption of healthy foods and discouraging consumption of unhealthy foods, and encouraging improvement of foods available in markets through innovation and reformulation.
- **Adaptable to national context:** Choices empowers countries to adapt the criteria by a local independent scientific committee to accommodate differences in nutritional needs, food culture and other considerations, such as the inclusion of positive nutrients that relate to undernutrition and micronutrient deficiencies. Only when the Choices International Scientific Committee has endorsed national criteria derived from the Choices criteria, these criteria will be recognized by Choices as the "Choices national criteria".



The use of the Choices International Multi-Level Criteria

Choices recommends to use its 5-levels are summarised in Table 1 and visualised in Figure 1 and Figure 2. Note that this is a recommendation and that countries have full autonomy to decide which food system actions they would like to implement and how they use their national (multi-level) criteria.

Table 1 Overview of food system actions in relation to Choices International multi-level criteria (1 - 5). Choices differentiates the use of its criteria between basic food groups and non-basic food groups.

	Choices Basic food groups	Choices Non-basic food groups
Positive FOP labelling	1	Not allowed
5-level (A-E) graded FOP labelling	A: 1 B: 2 C: 3 D: 4 E: 5	A – B – C: 1, 2 D: 3 E: 4, 5
3-level (Green, Amber, Red) graded FOP labelling	Green: 1, 2 Amber: 3 Red: 4, 5	Green: – Amber: 1, 2 Red: 3, 4, 5
Negative FOP labelling	4, 5	3, 4, 5
Reformulation benchmarks	% products 1 (positive logo) % products 1, 2 (A, B or Green) % products 3 (C or Amber)	% products 1, 2 % products 1, 2 (C" or "Amber")
Limitations in marketing to children	4, 5 (D, E, Red)	Not allowed
Subsidies	1 (positive FOPL) or 1, 2 (graded FOPL)	Not allowed
Taxation	4, 5	3, 4, 5
School meals	1 (positive FOPL) or 1, 2 (graded FOPL)	Not allowed
School environments	Minimum x% products 1 (positive FOPL) or 1, 2 (graded FOPL) 4, 5 not allowed	3, 4, 5 not allowed
Fortification	1 (positive FOPL) or 1, 2 (graded FOPL)	1 or 1,2 (graded FOPL) by exception following national fortification criteria
Health/nutrition claims	1 (positive FOPL) or 1, 2 (graded FOPL)	Not allowed

Choices levels	1	2	3	4	5
Positive FOPL	Positive Logo				
Graded 5-level FOPL	A	B	C	D	E
Graded 3-level FOPL	Green		Amber		Red
Negative FOPL					Negative Logo
Reformulation	% Green / A	% Green / B	% Amber / C		% Red / D, E
Marketing to children					Not allowed
Subsidies	Possible	Possible			
Taxation				Possible	Possible
School meals			Not allowed		Not allowed
School environments	Min % Green / A	Min % Green / B			Not allowed
Fortification	Possible	Possible	Not allowed		Not allowed
Health/nutrition claims	Possible	Possible	Not allowed		Not allowed

Figure 1 Visualisation of selected food system action in relation to Choices International multi-level criteria levels 1-5 for **basic food groups**



Choices levels	1	2	3	4	5
Positive FOPL				Not allowed	
Graded 5-level FOPL	C		D		E
Graded 3-level FOPL	Amber			Red	
Negative FOPL				Negative Logo	
Reformulation	% Amber / C			% Red / D, E	
Marketing to children			Not allowed		
Subsidies			Not allowed		
Taxation		Possible		Possible	
School meals	By exception			Not allowed	
School environments				Not allowed	
Fortification	By exception			Not allowed	
Health/nutrition claims	By exception			Not allowed	

Figure 2 Visualisation of selected food system action in relation to Choices International multi-level criteria levels 1-5 for **non-basic food groups**

Explanation

We explain in the follow sections the rational for these recommendations.

a) Alignment with national dietary guidelines

Choices food group specific approach makes it possible to use the Choices International criteria in line with national dietary guidelines. The Choices *basic-food groups* are the food groups that are promoted in national dietary guidelines, as they are the sources of key nutrients necessary for human health (Roodenburg, Popkin, & Seidell, 2011). *Non-basic food* groups (snacks, beverages, juices, condiments and sauces) are not expected to contribute key nutrients to the diet.

Therefore Choices recommends that only products in the basic-food groups at level 1, should be promoted as healthy. Products in non-basic food groups should not be promoted as healthy, even if they are at level 1. An exception could be considered where national criteria have included fortification of non-basic food groups that are at level 1 and fortified according to the national criteria (see i) Fortification programs). This principle is consistently used when using Choices criteria to substantiate the following food systems actions.

b) FOP Labelling

Whilst Choices is known for its positive directive (endorsement) FOP labelling, we have changed our position to accommodate and support more forms of directive FOP labelling. Stimulated by the WHO FOP labelling evaluation report (Kelly & Jewell, 2018), Choices has developed its MLC. Whilst developed for countries within the WHO Europe region, Choices recommends governments to use the WHO manual for FOP labelling (WHO Regional Office for Europe, 2020) as guidance to develop and implement FOP labelling. The MLC can be used as nutrient profiling model supporting the following forms of interpretative, directive and semi-directive FOP labelling: a. endorsement logos such as the Choices logo, Keyhole or various other forms of positive logos; b. graded logos such as the Nutri-Score or Health Star Rating labels; or c. negative summary logos, which currently do not exist but could be developed in theory. However, only labelling unhealthy foods and not promoting healthy foods does not help to encourage purposeful partnerships with the front runners in the food industry and should be carefully considered.



Figure 3 Interpretative directive and semi-directive FOP labelling (from (WHO Regional Office for Europe, 2020))



i. Positive FOP labelling (endorsement logos)

The Choices logo, registered in many countries, may be used or an alternative logo (Keyhole, heart logos or other logos) may be chosen. Only products of basic food groups at level 1 are eligible. We will advise countries that have implemented a Choices' based FOP labelling scheme including FOP labelling of non-basic food groups, to transition to a FOP Labelling scheme which forms part of a larger and coherent set of food systems actions.

ii. Graded FOP labelling (summary indicator systems)

Graded interpretative labels such as Nutri-Score or Health Star Rating could be based on Choices criteria rather than their scoring-based nutrient profiling models. We recommend that such labels would be implemented as part of a mandatory labelling scheme, so that also products which do not score favourably are labelled. Nutri-Score FOP labelling can be based on the corresponding levels for basic food groups. We recommend that non-basic food groups would only be eligible for C, D or E grades, products at level 1 and 2 labelled as "C", at level 3 as "D" and at level 4 or 5 as "E".

As current graded FOP labelling schemes have been developed in a Western context, they may not be ideal for in LMICs settings. The 5-levels system may need to be reduced to a 3-level ("green", "amber", "red") system as part of a national adaptation process. For basic food groups, Choices level 1 should be used as reference for green (healthy), level 2 and 3 amber and products in level 4 and 5 labelled as red. For non-basic food groups, green would not be used, amber for products in level 1 and 2 and red for the rest.

iii. Negative FOP labelling (interpretative warning logo)

Whilst such logos do not exist, they could be developed in theory and should become mandatory for all products that are in level 4 and 5 for basic food groups and 3, 4 and 5 in non-basic food groups.

c) Reformulation

Companies, which would like to use the Choices criteria as benchmark for reformulation, could use the following options to assess the healthiness of their portfolio:

- i. % of products at level 1
- ii. % of products compliant with "green" (only basic food groups in level 1 (and 2 if graded labelling is applied)), "amber" (basic food groups level 3 and non-basic food groups level 1 and 2).

This methodology takes into account the differentiation between basic and non-basic food groups. It stimulates and rewards reformulation to achieve the highest standard as the logo criteria do but also stimulates reformulation of products with a less healthy product profile to reach "amber" level.

d) Limitations in marketing to children

The MLC can be used as guidance for restrictions in marketing to children. As guidance for restrictions in marketing to children we recommend that all products in levels 4 and 5 of basic food groups and all non-basic food groups should not be advertised to children.

e) Financial incentives

The MLC can be used as guidance for financial incentives and disincentives. Rather than providing subsidies or raising taxes on selected food categories by governments, or other financial incentives (e.g. health insurance companies maybe using nutrient profiling to stimulate healthier diets amongst their customers), Choices recommends to use the MLC consistently with all other food system actions.



f) Subsidies / financial incentives

All products belonging to basic food groups labelled as "green" may be eligible for a subsidy / tax reduction / financial incentives.

g) Taxes / financial disincentives

Products of all product groups that are labelled "red" could be considered for taxation. Differentiation could be made between products at level 4 and level 5 using a graded 5-level FOP labelling system. In combination with a graded 3-level FOP labelling system or negative labelling system, such differentiation is not recommended.

h) Schools and other institutions

Choices recommends to use the MLC also as standards for school meals and school environments. For prepared or standardized school meals, the criteria for levels 1 (and 2) for meals can be used. For school environments (e.g. products sold in canteens or by food vendors), a certain percentage (e.g. > 50%) of the products offered for sale should be compliant with "green" and no unhealthy ("red") products are allowed to be sold. "Amber" products maybe allowed but should not be advertised. Non-basic food groups should not be part of school meals (e.g. beverages, fruit=juices or sweet or savoury snacks) but exceptions can be agreed at national level (e.g. fortified condiments that are used to prepare the meal). Similarly, these standards could also be applicable to other institutions with a public function (workplaces, cafeterias, hospitals...)

i) Fortification programs

Voluntary fortification should be only allowed for products in basic food groups at level 1 (or 2 with graded FOPL). Products in non-basic food groups should not be fortified, unless national criteria have included fortification of non-basic food groups that are compliant with level 1 (or 2 with graded FOPL) and fortified according to the national criteria. Exceptions such as mandatory fortification of sugar with vitamin A, and iodisation of salt are common public health practice and are not disputed by Choices. However, Choices recommends to be careful with positioning these products as "healthy".

j) Health claims

In line with our position discussed in paragraph a) Alignment with national dietary guidelines, Choices recommends that only products in the basic-food groups, at level 1 (or 2 with graded FOPL) should be considered to be allowed to carry a health or nutrition claim. Consistent with its "directive" character, Choices recommends not to allow nutrient claims (low in sugar, reduced fat etc.) but rather refer to interpretative FOP labels to inform consumers about the (improved) healthiness of a product.



Co-existence of (new) multi-level criteria and (existing) logo criteria

Once published (expected in 2nd half of 2021), there will be two sets of Choice criteria available: the newly developed and published MLC and the existing logo criteria as published in the latest review in 2019. Whilst the MLC can be used as basis for a positive health logo FOP labelling program, and thus replacing the logo criteria, a number of countries and companies have based their national criteria and nutrition policies based on the logo criteria of 2019. The logo criteria of 2019 and the MLC of 2021 can be both used till 1 Jan 2024 (4-years after publication in 2019 of the logo criteria).

References

- Kelly, J., & Jewell, J. (2018). *What is the evidence on the policy specifications, development processes and effectiveness of existing front-of-pack food labelling policies in the WHO European Region?* Copenhagen: WHO Regional Office for Europe.
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- Van den Assum, S., Schilpzand, R., Lissner, L., Don, R., Nair, K., Nnam, N., . . . Roodenburg, A. (2020). Periodic Revisions of the International Choices Criteria: Process and Results. *Nutrients*, 2774.