



EDA Reply to the TRIS notification from Slovenia on “Good Choice” nutrition label

January 2025

The European Dairy Association (EDA) has taken note of the [TRIS Notification](#) made by Slovenia regarding its “Good Choice” nutrition label.

As an interested stakeholder, EDA would like to share some comments and concerns regarding this development.

Comments from the European dairy sector:

EDA supports the fact that the positive 'Good Choice' system is based on categories. This makes the nutritional evaluation of the product more valid and relevant, also taking into account the intrinsic properties of the different food groups. Indeed, any front-of-pack nutrition label must allow consumers to choose between and within categories and products in terms of the frequency and quantity required to achieve a balanced diet.

Moreover, **the inclusion of only nutrients to reduce is a limitation.** A 'good choice' label should represent the overall nutrient contribution of the food. Therefore, the product evaluation must **take into account the total nutritional content of the food, both encouraged nutrients** (e.g. protein, vitamins and minerals) **as well as nutrients to limit** (e.g. fat, added sugar and salt). Indeed, dairy products are recommended by all Food-Based Dietary Guidelines across Europe due to their high nutritional value. Enriching the evaluation this way would ensure that foods fulfilling the criteria for 'Good choice' are truly of a high nutritional quality/nutrient dense and are **not only low in nutrients to limit.** The absence of nutrients to limit doesn't make a food healthy. With this said, this is only an issue if non-whole foods are included as potential carriers of the label. So, by excluding the 'plant-based drinks' category this issue would more or less be solved, as all other categories on the list are natural whole foods that by their nature provide the expected beneficial nutrients.

However, most Food-based dietary guidelines (FBDGs) are not directly recommending **plant-based drinks**, but only stating them as an option IF the consumer is not able to/chooses not to drink milk. Therefore, **this category should not be part of the 'good choice' list.** FBDGs generally recommend consumption of whole foods.

EDA disagrees with the inclusion of sweeteners and colourings as they are approved food additives with no adverse health effects. They should not be taken into account for a label promoting healthier food choices. In our opinion a nutritional system should not be mixed with additional criteria based on the presence or absence of certain types of ingredients such as additives and should remain nutrition-science based.

Conclusions:

EDA welcomes the fact that the “Good Choice” label is voluntary and category-based but is **concerned with the inclusion of plant-based drinks as a category**. We would also like to point out that foods should not be awarded the label solely based on their low quantity of fat, sodium or sugar but **also on the presence of essential nutrients** that make a food healthy and therefore part of the relevant national dietary guidelines, such as dairy products. Indeed, any scheme should first and foremost align with dietary recommendations.

EDA also takes this opportunity to reiterate its **core principles** when it comes to Front-of-Pack Nutritional Labelling as detailed in our position paper (available [here](#)):

- Its application should be **voluntary and harmonised** across the EU
- The scheme should be in **line with food-based dietary guidelines** and **consider essential nutrients** (e.g. calcium) and basic food groups (such as milk and dairy products)
- It should provide **improved and correct information to consumers** about the overall nutrient composition of foods in a sub-category-specific manner, considering the frequency and quantity required to achieve a balanced diet
- The criteria should be **based on sound scientific evidence** and be regularly monitored to ensure correct implementation and evaluation of the actual impact on consumer health