Message 201

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Directive (EU) 2015/1535

Notification: 2024/0577/SI

Forwarding of the response of the Member State notifying a draft (Slovenia) to request for supplementary information (INFOSUP) of European Commission.

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1. MSG 201 IND 2024 0577 SI EN 16-01-2025 12-11-2024 SI ANSWER 16-01-2025

2. Slovenia

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4. 2024/0577/SI - C50A - Foodstuffs

5.

6. The Republic of Slovenia's response to the EC's requests for additional clarifications regarding notification No 2024/577/SI.

Labelling foods with the ‘Good Choice’ label will make it easier for consumers to identify foods with a favourable nutritional composition, which is in accordance with the national Resolution on the National Programme on Nutrition and Physical Activity for Health 2015–2025 – ReNPPTDZ (1).
Foods labelled by producers with the ‘Good Choice’ label will be selected in the diet of all population groups in Slovenia, including children and adolescents.
The conditions for the use of the ‘Good Choice’ label are therefore chosen very carefully and in such a way that they follow all relevant national guidelines regarding nutrition, such as, in addition to the ReNPPTDZ (1), the Guidelines for nutrition in educational institutions (2) or the Nutrition Guidelines for the creation of rules of conduct to protect children from inappropriate commercial messages (3) and the EU school fruit, vegetables and milk scheme, funded through the EU Common Agricultural Policy (4).
In Slovenia, high sugar consumption and the prevalence of obesity are particularly concerning. To address the problem of obesity at the national level, the Ministry of Health of the Republic of Slovenia has prepared a strategic plan for the gradual reduction of the percentage of overweight and obese individuals. One of the main goals of the Resolution on Nutrition and Physical Activity for Health (ReNPPTDZ) 2015–2025 is to reduce the intake of free sugars by 15%, with a particular focus on sugary drinks and sweets (1).
The results of the latest international HBSC (Health Behaviour in School-aged Children) study showed that a fifth (20.4%) of adolescents are classified as overweight and obese according to their BMI (5). According to the latest available data, the nutritional intake of Slovenian adolescents does not meet the recommendations for a healthy and sustainable diet, which must be taken into account in future public health strategies (6).
National sales data provided by retailers showed that sweets and soft drinks accounted for more than 50% of all free sugars sold on the Slovenian market (7). Therefore, limiting the sugar content in soft drinks that would be marked with the ‘Good Choice’ label is a targeted measure for choosing foods with a favourable nutritional composition. The use of

sweeteners in food processing is a less desirable way of reducing sugar content, as it does not accustom consumers to a less sweet taste.
The World Health Organization (WHO) issued new recommendations on the use of non-sugar sweeteners (NSS) in 2023, advising against their use for weight management or to reduce the risk of non-communicable diseases (NCDs). The recommendation is based on the findings of a systematic review of the available evidence showing that the use of NSS has no long-term benefits in reducing body fat in adults or children. The results of the review also suggest potential adverse effects of long-term NSS use, such as an increased risk of type 2 diabetes, cardiovascular disease, and mortality in adults (8). The WHO states that the recommendations in these guidelines can be implemented in a variety of ways, including behavioural change interventions, tax policies, regulation of the marketing of food and beverages, by redesigning the composition of industrially produced products, and also through product labelling schemes, such as the 'Good Choice' labelling of foodstuffs in our case.
Colours, just like sweeteners, have no nutritional value, and their use often replaces more nutritious, natural ingredients. Food additives belonging to the group of colours and sweeteners do not contribute to the intake of healthy nutrients such as dietary fibre, vitamins or minerals and can encourage the consumption of more processed and less healthy foods with a pleasant sweet taste and colour.
Greater exposure to highly processed foods has been associated with a greater risk of adverse health effects, in particular metabolic diseases, common mental disorders and mortality. Results of a recent meta-analysis by Lane M et al. (9) justify the development of public health population measures with the aim of reducing exposure to highly processed foods, although not all mechanisms of harmful action are known yet. New studies on people show links between exposure to additives, including non-sugar sweeteners, emulsifiers, colours, and nitrates/nitrites, and adverse health effects (9).
The European Union's Horizon 2020 research programme project 'STOP' (10) found that ultra-processed foods (UPFs) are associated with childhood obesity. Among the proposed measures, the researchers included supportive policies that reduce incentives for UPF within the food system and food environment, with a particular focus on the school food environment. The introduction of 'Good Choice' labelling for foods that are less processed and do not contain food additives belonging to the group of sweeteners and colours is one such measure.
(1) Resolucija o nacionalnem programu o prehrani in telesni dejavnosti za zdravje 2015–2025 (Resolution on the National Programme on Nutrition and Physical Activity for Health 2015–2025) (ReNPPTDZ) https://www.dobertekslovenija.si/wp-content/uploads/2017/10/Resolucija_.pdf
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(3) Ministry of Health of the Republic of Slovenia. Prehranske smernice za oblikovanje pravil ravnanja za zaščito otrok pred neprimernimi komercialnimi sporočili (Nutrition Guidelines for the creation of rules of conduct to protect children from inappropriate commercial messages), Ljubljana, 2016. https://www.gov.si/assets/ministrstva/MZ/DOKUMENTI/Preventiva-in-skrb-za-zdravje/Varovanje-in-krepitev-zdravja/prehrana-in-telesna-dejavnost/prehranske_smernice-oglasevanje_072016.pdf
(4) School fruit, vegetables and milk scheme https://www.gov.si/teme/solska-shema-sadja-zelenjave-in-mleka/
(5) JERIČEK KLANŠČEK, Helena, FURMAN, Lucija, ROŠKAR, Maja, DREV, Andreja, PUCELJ, Vesna, KOPRIVNIKAR, Helena, ZUPANIČ, Tina, KOROŠEC, Aleš. Z zdravjem povezana vedenja v šolskem obdobju med mladostniki v Sloveniji : izsledki mednarodne raziskave HBSC (Health-related behaviours during the school period among adolescents in Slovenia: findings of the international HBSC survey), 2022. Electronic edition. Ljubljana: National Institute of Public Health, 2023. 1 online source (1 PDF file (134 pages)), illustrated. ISBN 978-961-7211-07-8. https://nijz.si/wp-content/uploads/2023/10/HBSC_e_verzija_obl_2023.pdf.
(6) Poličnik R, Hristov H, Lavriša Ž, Farkaš J, Smole Možina S, Koroušić Seljak B, Blaznik U, Gregorič M, Pravst I. Dietary Intake of Adolescents and Alignment with Recommendations for Healthy and Sustainable Diets: Results of the SI.Menu Study. Nutrients. 2024 Jun 17;16(12):1912. doi: 10.3390/nu16121912. PMID: 38931267; PMCID: PMC11206795.
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(8) Use of non-sugar sweeteners: WHO guideline. Geneva: World Health Organization; 2023. Licence: CC BY-NC-SA 3.0 IGO.
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(10) https://www.stopchildobesity.eu/wp-content/uploads/2022/12/WP3.pdf

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