



EMPOWERING CONSUMER ORGANISATIONS: TOWARDS A HARMONISED APPROACH TACKLING DUAL QUALITY IN FOOD PRODUCTS

ANNUAL REPORT 2021

This Annual Report sets out high level observations from a one year long testing campaign conducted in the context of the “Empowering Consumer Organisations: towards a harmonised approach tackling dual quality in food products” (ECO) Project. More information on the ECO Project can be found on the project’s website www.fightdualfood.eu. This report summarises our findings based on data which was available on the project’s online interactive platform as of 31 August 2021. Out of 150 collected products, 104 products have been published on the project’s online interactive platform and compared at this stage, while the remaining 46 products are in course of publication. Therefore, these findings constitute only provisional results since the newest data to be published on the website could result in discrepancies between the percentages set out in this report and those that will be derived from the inclusion of the new data.

Products selected for testing met the following criteria:

- Sold in a minimum of 3 member states
- Sold under the same brand and identical or very similar packaging
- Consumers in the EU generally associate the product with a given composition and image, in the sense that they do not expect the composition to be different in the presence of a same or very similar front-of-pack.


Testing was primarily in the form of a comparative review of i) front-of-pack presentation (for the purpose of determining products’ eligibility for testing), ii) nutritional values and iii) ingredients.

Out of the 104 tested products, all exhibiting identical or similar front-of-pack, we identified discrepancies in the type of ingredients, amount of ingredients and nutritional values in 52 products, representing 50% of the tested products. Of these:

- A) 45 products or 43% presented qualitatively different ingredients
- B) 10 products or approx. 15% presented discrepancies of at least 1% in the amount of at least 1 ingredient (**n.b.:** this data was available for only 69 of the 104 products referenced in this report, and the percentage quoted has therefore been calculated as a percentage of this smaller group of products)
- C) 39 products or 37% presented discrepancies of at least 1g in the amount of at least 1 nutritional value, or of at least 1 kcal of energy
- D) 52 products or 50% presented none of the above discrepancies

Discrepancies of the nature of any of the above resulted in the use of a 😞 for affected products, with the writing “Needs further information” and the use of terminology such as “medium” in the narrative under “Conclusion”. “Needs more information” is used to signify that, despite the identified differences, due to the fact that dialogue with the producers of the relevant products was not uniformly established

and legal counsel was not retained to assess potential justifications, it was not always possible to conclusively determine whether the discrepancy might be justified in the light of legitimate and objective factors under the relevant legislation. As such, description of a product as “medium” and the use of the associated symbol is not reflective of the quality of the product, nor of the product’s compliance (or lack of compliance) with applicable EU legislation. Similarly, the use of “Needs further information” is not reflective of a lack of engagement on the part of producers.

Products with a  may also present minor discrepancies, which however fall below our 1%/1g/1kcal tolerance threshold.

By clicking on the corresponding product’s image, users can access the underlying information under the tabs “Nutrition Values”, “Quid” and “Ingredients”.

When qualitatively different ingredients were observed, this affected a variety of tested products and ingredients within these products and we could not observe any particular pattern.

When discrepancies of at least 1% in the amount of at least 1 ingredient were observed, these affected a varying number of ingredients ranging from a minimum of 1 ingredient to a maximum of 4 ingredients in the product’s formulation. Quantitative differences ranged from a minimum of 1% to a maximum of 22%.

When discrepancies of at least 1g in the amount of at least 1 nutritional value, or of at least 1kcal of energy, were observed these affected between 1 and 6 nutritional values and quantitative differences ranged from a minimum of 1g to a maximum of 11.4g, and from 1kcal to a maximum of 63kcal.

As it relates to the geographic distribution of outliers, we found that product formulations that most differed from what appeared to be the more common formulation, were most often found in Greece (15 cases), although they were also observed in Spain (8 cases), Ireland (8 cases), Italy (7 cases), Denmark (5 cases), Belgium (2 cases), and France (2 cases). This means that where a range of values was observed for nutrition information and/or ingredients, these countries were called out as having product formulations with nutrition information and/or ingredient amounts at the lower or upper end of the range.

We note that - while this was not within the scope of the testing conducted for the project - in the course of conducting testing, contributing organisations observed discrepancies between the product information as found on supermarkets’ websites and that found on products’ actual packaging. We believe that these discrepancies may warrant further investigation by local national authorities, as they could conceivably affect purchasing decisions, should these be made by browsing products online and not by reading products’ labels in supermarkets.