



The European debate on Front-of-Pack Labels: Public Health, Food Culture, and the Politics of Nutritional Information

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Abstract

Since the mid-twentieth century, global agri-food systems have been increasingly shaped by what McMichael defines as the corporate food regime, characterised by the commodification of food and the growing distance between production and consumption. In this context, nutritional labelling has emerged as a key policy instrument to address rising rates of overweight and obesity across Europe. This article argues that Front-of-Pack Labels (FoPLs) are not neutral technical devices based on universal nutritional science, but politically and culturally situated instruments of public action. Focusing on the controversy between France's Nutri-Score and Italy's NutriInform Battery, the article analyses how competing food cultures, economic interests, and epistemological assumptions about health shape national positions on food labelling. Drawing on food regime theory and the sociology of public policy instruments, the paper shows that the Italian resistance to Nutri-Score reflects broader concerns about the symbolic, territorial, and economic value of traditional foods, rather than purely technical disagreements over nutritional communication. The European debate on FoPLs thus reveals the inherently political nature of nutritional information and highlights the limits of standardised labelling as a standalone solution for promoting healthy and sustainable diets.

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Introduction: the corporate food regime and the need for labelling food from nowhere

In recent years, national and international institutions have started to elaborate policies, initiatives and tools for promoting healthy nutrition, given the rising emergency of malnutrition and obesity. A privileged solution has been labelling food in order to enhance consumers' awareness and orient people's choices. This article argues that Front-of-Pack Labels are not neutral technical devices grounded in universal nutritional science, but politically and culturally situated instruments of public action that reflect competing food imaginaries, economic interests, and epistemologies of health. To do so, we have considered the Italian–French controversy, which represents a paradigmatic case through which the political nature of nutritional labelling becomes visible.

Since the 1920s, global agriculture has undergone a drastic transformation, which accelerated after the Second World War, marking a sharp break from the practices of the previous millennia that followed the Neolithic revolution, when humans began to control plants and animals to produce food and other goods. In this context, McMichael (2005; 2013) introduces the concept of the corporate food regime to analyse the historical and geopolitical configurations through which agriculture and food have been organised globally to support capitalist accumulation. Each food regime is characterised by certain fundamental aspects, such as a relative stability in the relationships between food production, trade, and consumption; a set of rules (explicit or implicit) that reflect and reinforce geopolitical power relations; and internal contradictions that eventually lead to its crisis and transition to a new regime. The corporate food regime is defined by the privatisation and financialisation of the means of production, the commodification of food, and the dispossession and depeasantisation of agricultural production.

In response to the challenge of feeding a growing global population without worsening the environmental crisis, two profoundly divergent approaches have emerged: sustainable intensification and agroecology (Constance and Loconto, 2024). These strategies embody two opposing worldviews, rooted respectively in industrial and agrarian ethics, and based on two distinct epistemological paradigms: food security and food sovereignty (McMichael, 2014). The industrial perspective views agriculture as a productive sector like any other, focused on efficiency and cost reduction through economies of scale, often at the expense of workers, communities, the environment, and animal welfare. In this model, sustainability is understood as 'producing more with less'. Politically, the rhetoric of sustainable intensification has gained broad support, but it has also faced criticism for prioritising increased production over the actual reduction of environmental impacts.

Blacha (2024) provides the example of Argentina, where the diet promoted by the corporate food regime is high in calories but poor in nutrients. In Argentina, more than 3,000 kcal per capita per day are consistently produced, yet significant issues of hunger and malnutrition persist. Food-as-commodity is not produced to feed people, but to be sold on the global market. This scenario leads to a disconnection between consumers and producers, with food being distributed through sales channels offering 'food from nowhere' (McMichael, 2013; Campbell, 2009). Peasant agriculture, based primarily on self-production, is being displaced by agribusiness, which makes it nearly impossible to trace products, especially highly processed ones composed of a multitude of ingredients and losing any grounding in the context. It is precisely this anonymous food, distributed through organised retail, that requires detailed labelling to give consumers at least a general idea of what they are about to eat.

Starting from these premises, we are trying to offer a point of view to understand the European debate on Front of Pack Labels (FoPL), specifically considering the only apparently technical diatribe between Italy and France, and trying to clarify the political and even epistemological nature of this disagreement. In this positional paper, we first introduce the issue of obesity, which is rising alarmingly across Europe, to the point of being declared an epidemic, and we examine how international institutions, such as the United Nations



and the European Union, have identified labelling as a promising tool in this regard. In our view, FoPLs can be seen and analysed as instruments of public action (Lascoumes and Le Galès, 2004) which, in this specific case, intervene in the link between food and health by seeking to act on consumers' ability to understand the food they purchase.

The second part of the article analyses Italy's position regarding FoPL and the reasons underlying the diatribe between France and Italy. The analysis shows how the broad coalition of Italian institutions and societal stakeholders affirming specific political-economic priorities and contesting the French Nutri-Score ultimately demonstrates that FoPL are not simple technical devices but political and cultural ones, grounded in specific contexts, epistemologies and food imaginaries.

The conclusions attempt to draw a line connecting the more general issue of agro-industrial production and the need for labelling 'food from nowhere' to people's education towards healthy and wholly sustainable nutrition, clarifying how nutritional information tools are politically charged artefacts (Gardner and Abrams, 2023).

By mobilising food regime theory and the sociology of public policy instruments, the article contributes to critical debates on food labelling, public health governance, and the political economy of nutrition.

The need for nutritional labels

The rise of obesity and Europe's commitment to contain the phenomenon

The World Health Organization (WHO) declares obesity a true global epidemic.¹ In its 2022 report on obesity in the European region (WHO, 2022), it highlights that 59% of adults and 28% of children are affected by overweight or obesity, considering obesity a real disease that causes disability and 1.2 million deaths in the region, accounting for over 13% of total mortality. Eurostat (2024) reports that in 2019, 53% of the European Union population was overweight and that obesity has tripled over the past four decades, worsening related diseases, particularly those affecting the cardiovascular system, which have led to a reduction in average life expectancy at birth by nearly one year for men (Vidra et al., 2019). An individual's overweight status also negatively impacts psychological health (Wardle and Cooke, 2005) and, beyond its effects on the individual, has a significant impact on the social system in which the person lives, including increased healthcare costs (Landovská and Karbanová, 2023).

Analysing data provided by Eurostat from the European Health Interview Survey (EHIS),² significant differences at the community level can be observed, as shown in Figure 1, which provides a graphical representation of obesity and overweight incidence across different European Union countries. Differences in obesity rates are strongly correlated with gender and education levels in all European countries, where obesity is more prevalent among male citizens and individuals with lower educational attainment (Vandevijvere et al., 2023). Another alarming aspect is the situation among children, with 18% of European children aged 2–7 years being overweight or obese between 2013 and 2016, and a five times higher risk for these children to be obese in adulthood (Moholdt and Stanford, 2024).

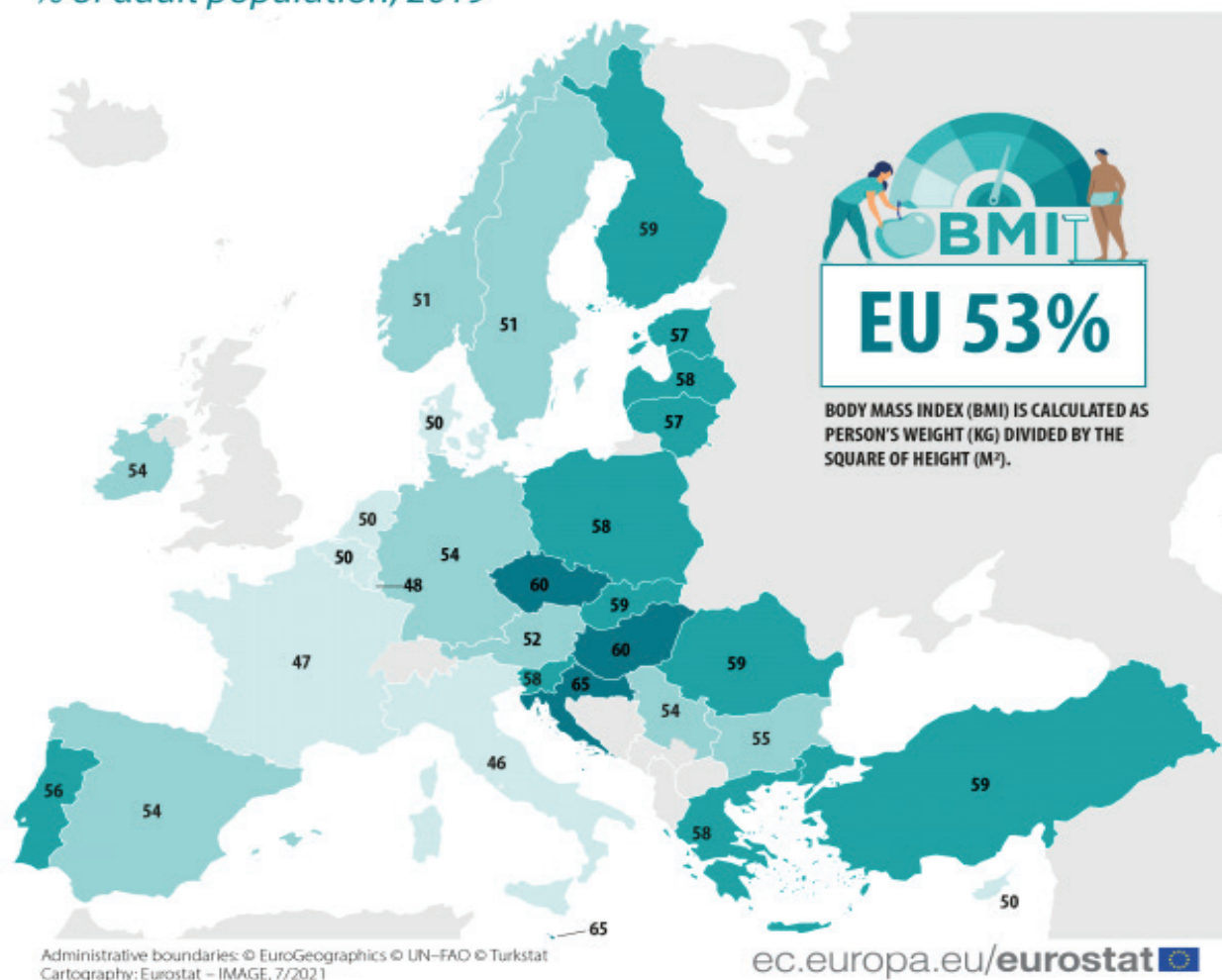
Focusing specifically on the cases of Italy and France, which is useful for developing the discussion, it is worth noting that these two states have the lowest incidence of obesity and overweight compared to all other European countries.

¹ <https://iris.who.int/bitstream/handle/10665/370281/9789240075634-eng.pdf?sequence=1>

² [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:European_health_interview_survey_\(EHIS\)](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:European_health_interview_survey_(EHIS))

Figure 1: Percentage of obese or overweight people in the total population in different European countries³**Overweight population (BMI ≥ 25)**

% of adult population, 2019



The factors influencing the onset of obesity are numerous, as are those contributing to its significant increase on a global scale, as previously highlighted. Among these are, on the one hand, sedentary lifestyles and the lack of physical activity among both adults and children, and on the other hand, unhealthy diets. This is especially exemplified by the emerging phenomenon of passive overconsumption (Finlay et al., 2024), which refers to the largely unconscious and compulsive consumption of highly energy-dense foods. Among unhealthy dietary habits, excessive consumption of fats and added sugars stands out, along with the low intake of fruits and vegetables in individual diets and a high consumption of sugary beverages between meals (Jayedi et al., 2020; Tahmassebi and Banihani, 2020). Although there are significant differences in dietary patterns across European countries, particularly between the North and South of the continent (Mertens et al., 2019), the trend towards unbalanced diets is widespread (Skotnicka et al., 2021).

Additionally, there is a general lack of awareness regarding one's own health status and excess weight. The low awareness of obesity and its associated risks, such as cardiovascular diseases, type 2 diabetes, and even cancer, exists both at an individual level (Andrikopoulos et al., 2012) and at a collective and policy level (Shut et al., 2020). Despite its strong standing in the European rankings, this phenomenon is also evident in Italy, where nearly half of individuals with a BMI over 25, a parameter used to identify excess weight, are unaware that they are overweight (Masocco et al., 2023).

³ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Overweight_and_obesity_-_BMI_statistics



Research conducted by the World Health Organization on eating habits in Europe shows that total fat intake in adult diets ranges from 30% to more than 40% of total energy intake (WHO, 2022). Although fruit and vegetable consumption has generally increased in recent decades, there are still significant geographical and social disparities (Stea et al., 2020). Moreover, it is important to note that Europe holds the global record for alcohol consumption (Ritchie and Roser, 2023), with a persistent issue of heavy drinking among adolescents (Loy et al., 2021).

The role of a healthy diet, rich in plant-based foods and micronutrients, in promoting overall health is well documented (Wu et al., 2019), even for individuals affected by obesity (Arenaza et al., 2019). In this context, education on healthy eating is essential. Schools play a crucial role in food education, but the influence of media and social media in shaping consumer choices is also powerful (Hawkins et al., 2020; Calvo-Porrall et al., 2021).

Thus, the issue is not only about having theoretical knowledge of what constitutes a healthy diet but also understanding the many factors that influence final food choices. These include an individual's lifestyle, food costs, marketing strategies, and food labelling (Kodali and Telaprolu, 2018). The difficulty in properly interpreting food labels has also been documented in relation to the environmental impact of packaging, with consumers often overestimating or underestimating values due to insufficient information (Otto et al., 2021). To assist and guide states, the WHO has proposed the Global Strategy on Diet, Physical Activity, and Health, with four key objectives:

1. Reducing the risk of non-communicable diseases linked to unhealthy diets;
2. Increasing awareness and understanding of how diet and physical activity influence health;
3. Encouraging and strengthening global, regional, national, and local policies that promote a healthy diet and lifestyle, involving civil society and the media;
4. Monitoring data through scientific research and promoting studies to support the strategy.

Following this initiative, the Codex Alimentarius Commission also took action to support the Global Strategy. The document prepared by the Commission, called 'Codex Alimentarius',⁴ serves as a guideline for governments, which are free to decide how to promote and encourage the implementation of its principles. These principles include:

- Protecting consumers from foodborne diseases and poisoning;
- Ensuring fair food standards for consumption;
- Maintaining trust in international trade;
- Providing health education programmes;
- Ensuring that consumers receive clear and understandable food information through labelling.

As can be seen, food health policies clearly highlight the importance of information about what people eat. A further element to be taken into consideration concerns the instruments that institutions have at their disposal to intervene in food consumption dynamics and in the protection of health (Cochoy, 2004).

The information currently available on packaged foods sold in Europe is regulated by EU Regulation 1169/2011, which establishes what must be communicated regarding ingredients, calorie content, and the presence of allergens. It also includes substances that should be consumed in moderation, such as sugars, salt, saturated fats, preservatives, additives, and colourants. Most of this information is displayed on the back of the packaging, often in very small print. In the terms of the sociology of packaging (Cochoy, 2002), this represents the 'information dimension' that points to the product's substantial and material components and which is opposed to the 'symbolic dimension' (Cochoy, 2004). Given the rise in unhealthy eating habits, despite the completeness of the information on food packaging, international institutions have concluded

⁴ Codex Alimentarius Commission was established in 1963 by the FAO and the World Health Organization to protect consumer health and ensure fair practices in international trade <https://www.fao.org/fao-who-codexalimentarius/codex-texts/en/>

that the nutritional declarations currently required for most packaged products are not clear enough to effectively communicate a product's healthiness and caloric intake to consumers. From this conclusion, the idea of developing additional communication strategies, including Front-of-Pack labels (FoPLs), was born. This article aims to highlight the debate surrounding the adoption of these labels in various European countries, which are intended to help and guide consumers in their purchasing and consumption choices. However, their adoption has not been uniform across all states and has led to misunderstandings, if not outright conflicts, particularly between Italy and France.

Labelling: from Regulation 1169/2011 to FoPL

Food packaging includes various labels, such as quality, origin, and process certifications (for example, if the product is organic), as well as nutritional labels. Article 1 of EU Regulation 1169/2011 defines a food label as:

Any trade mark, brand name, sign, illustration, or other graphical representation, whether written, printed, stamped, marked, embossed, or impressed on the packaging or container of a food product or accompanying such packaging or container.⁵

The fundamental objectives of this Regulation are ensuring a high level of consumer protection, guaranteeing the right to information on consumed food, ensuring the free circulation of safe and healthy food, and allowing consumers to make informed choices. As we know from everyday experience, among the mandatory information, labels must indicate: the physical state of the product (powdered, concentrated, frozen, etc.); the list of ingredients, listed in descending order by weight; the allergens, highlighted with a different font to make them stand out; [6] the expiration date or minimum durability date; the storage and usage conditions; and the country of origin or place of provenance. For fresh products such as meat, fish, fruit, vegetables, honey, and oil, it is mandatory to indicate both the origin of the raw material and the place of processing and packaging. Additionally, nutritional declarations must include: energy value, fats, saturated fatty acids, carbohydrates, sugars, proteins, and salt. These values are typically provided per 100g or 100ml of the product. The name of the food, net quantity, and the name and address of the responsible food operator must also be indicated. The information provided is generally quite complete, but often hard to read—whether because of small font size or poor placement—and, most importantly, difficult to interpret. An essential dimension for understanding the effectiveness of the label, which we will return to later, is the placement of this information—a placement often dictated more by producers' marketing strategies than by a genuine intention to inform the consumer. Unlike what has just been shown, unpackaged foods—such as fruit, bakery products, meat, and cheese sold by weight—have less stringent labelling requirements. However, for these products, information on allergens, expiration date, and storage conditions must still be provided. Nutritional declarations are not mandatory for unpackaged foods.⁶

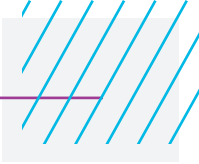
With the introduction of EU Regulation 1169/2011, the European Union aimed to enhance transparency and safety in the agri-food chain while also addressing the rising rates of overweight and obesity. By consolidating existing regulations on advertising, labelling, allergen disclosure, and nutritional information into a single framework, the EU sought to improve consumer awareness and decision-making.

The regulation introduced key innovations,⁷ but despite these improvements, research shows (Grunert et al., 2010) that food labels remain difficult to understand and use, mainly because they are often placed on the back or side of the packaging in small, hard-to-read fonts. As a result, many countries have considered modifying food labelling to make it more accessible and effective in tackling obesity and overweight issues.

⁵ <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:304:0018:0063:it:PDF>

⁶ Source: Food Labeling - European Regulations and 2021 Updates (hideea.com)

⁷ This key innovations including: Improved readability of mandatory information; Clear identification of the responsible party for food information accuracy; Mandatory allergen labeling; Providing food information online before purchase; Mandatory indication of origin; Detailed specification of oils and fats used; Labeling requirements for defrosted products; Disclosure of nanomaterials in ingredient lists; Nutritional labeling requirements.



better understand the relevance of labels in the process of purchasing a food product, we need to broaden the discussion beyond the purely informational dimension. Franck Cochoy uses the concept of a marketing mix (Callon, 1998). This concept substitutes a quadruple reality: a product is a Price, it is the object of a Promotion, it is a Place where it is available and, lastly, it is the target of a Product strategy. The product is therefore a multidimensional reality, and the choice of one label rather than another can radically change the mix and the balance of these four dimensions.

The different labels adopted in Europe

To achieve the goal of more accessible and effective information, as early as 2004 the World Health Organization (WHO) proposed Front-of-Pack labelling (FoPL)—nutritional labels placed directly on the front of packaging. According to the WHO, FoPLs provide additional nutritional information and are a valuable tool for implementing policies that promote healthy diets, helping consumers make healthier and more informed choices.⁸ FoPLs are particularly important because they provide additional consumer information beyond legally required details, including insights into quality management processes, product origins, and food uses.⁹ The WHO's push for widespread adoption of FoPLs is not a new concept in the field of food information. Several EU member states had already independently adopted different FoPL schemes before the WHO's initiative.

Since 1989, Sweden—followed by Norway (2009), Denmark (2009), Iceland (2013), Lithuania (2013), and North Macedonia (2015)—has adopted the Keyhole logo (Figure 2) to indicate healthier food products.¹⁰ The criteria for this label, based on the Nordic Nutrition Recommendations (NNR),¹¹ include: lower fat content; healthier fats, with maximum limits on saturated and trans fats; less sugar and less salt compared to standard products; more fibre and whole grains; more fruits and vegetables; no artificial sweeteners or phytosterols. In Finland, the use of a FoPL came even earlier: the 'Heart – Best Choice' symbol was introduced, promoted by associations focused on preventing diabetes and heart disease. This symbol is paid and is considered the only officially recognised nutritional label in the Finnish market. The need for a logo to guide consumers towards heart-healthy and diabetes-preventive foods was identified in 1997, and the symbol was officially adopted in 2000 (Lahti-Koski et al., 2012). Similarly, Slovenia has adopted a heart logo to mark foods that help prevent cardiovascular diseases, while Croatia introduced the 'Healthy Living' logo with similar criteria.

The Choices International Foundation owns the 'Healthy Choice' logo, also known as the 'tick', which identifies the healthiest products within food groups.¹² The logo's criteria are based on levels of saturated and trans fats, added sugars, salt, dietary fibre, and/or energy content. This label was active in the Czech Republic and the Netherlands until 2017.

In the United Kingdom, a voluntary Front-of-Pack (FoP) label called the 'Multiple Traffic Light' (MTL) scheme was introduced.¹³ This label uses a colour-coded system to indicate the percentage of reference intake per serving. The colours used are: green (low content); amber (moderate content); red (high content). The MTL label displays the percentage of fats, saturated fats, sugars, and salt relative to the recommended daily intake. The UK has used this system since 2013, and currently two-thirds of products on the market carry the MTL label. Six major food and beverage multinationals developed the 'Evolved Nutrition Label' (ENL), which also follows a colour-based system similar to the UK's approach.¹⁴

⁸ <https://www.who.int/publications/m/item/guidingprinciples-labelling-promoting-healthydiet>

⁹ <https://www.who.int/news/item/27-09-2021-state-of-play-of-who-guidance-on-front-of-the-pack-labelling>

¹⁰ https://food.ec.europa.eu/system/files/2018-04/comm_ahac_20180423_pres2.pdf

¹¹ <https://www.norden.org/en/publication/nordic-nutrition-recommendations-2012>



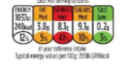





¹² <https://www.choicesprogramme.org/>

¹³ <https://www.food.gov.uk/safety-hygiene/check-the-label>

¹⁴ <https://referenceintakes.eu/understanding-label.html>

But perhaps the most important date to consider is 2017, when France adopted Nutri-Score, which further developed the UK's Food Standards Agency label. Nutri-Score classifies products on a scale from 'A' to 'E', with colours ranging from dark green to red. The classification is based on a balance between elements to be limited and those to be encouraged. Elements to limit: energy, saturated fats, sugars, and salt. Elements to encourage: fibre, protein, fruit, vegetables, and legumes.

Figure 2: List of FoPLs adopted in European countries

Taxonomies put forward in the literature				Examples of FOP schemes		Developer	EU Member State
Nutrient-specific labels	Numerical	Non-directive	Reductive (non-interpretative)	Reference Intakes label		Private	Across the EU
				NutrInform Battery		Public	IT
	Colour-coded	Semi-directive	Evaluative (interpretative)	UK FOP label		Public	UK
				Other 'traffic light' labels		Private (retailers)	PT, ES
Summary labels	Positive (endorsement) logos	Directive	Evaluative (interpretative)	Keyhole		Public	SE, DK, LT
				Heart/Health logos		NGO Public	FI SI HR
				Healthy Choice		Private	CZ, PL Phased out in NL
	Graded indicators			Nutri-Score		Public	FR, BE ES, DE, NL, LU

Source: Report from the Commission to the European Parliament and the Council regarding the use of additional forms of expression and presentation of the nutrition declaration p.7¹⁵

The reference units used in Nutri-Score are 100g for solid foods and 100ml for liquids. Nutri-Score has been widely praised for its clarity and effectiveness in communication (Gassler et al., 2023). In April 2020, a coalition of food companies, academics, consumer organisations, policymakers, and retailers sent a letter to the European Commission, requesting a legislative proposal to make Nutri-Score mandatory in all EU Member States.¹⁶ The European Union, following the Farm to Fork Strategy,¹⁷ aimed to harmonise mandatory front-of-pack nutrition labelling by 2022, to eliminate inconsistencies in the various labelling systems adopted by different Member States. Currently, consumers receive different types of information, making it difficult to compare products due to inconsistent parameters, colours, shapes, and nutritional information.

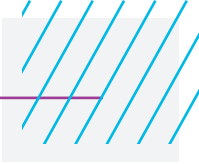
Another important date to consider is 2020, when—after nine years since the enactment of the EU regulation and in open contrast to the Nutri-Score proposal—Italy formulated a counterproposal by introducing the 'NutrInform Battery' label. This system uses the battery symbol to indicate the amount of energy and nutrients in a portion of food, using the 'presumed daily intake' as a reference. The scheme was established by the Legislative Decree of November 19, 2020, which defines the form of presentation and conditions for the use of the optional nutritional logo, in accordance with Article 35 of EU Regulation 1169/2011.¹⁸

¹⁵ https://food.ec.europa.eu/document/download/310ad7a1-aa8b-49f6-babf-55ec572f0f75_en?filename=labelling-nutrition_fop-report-2020-207_en.pdf

¹⁶ [https://www.europarl.europa.eu/RegData/etudes/BRIE/2020/652028/EPRS_BRI\(2020\)652028_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2020/652028/EPRS_BRI(2020)652028_EN.pdf)

¹⁷ Source: Official EU website. The Farm to Fork Strategy aims to establish a fair, healthy, and environmentally friendly food system. The strategy outlines both regulatory and non-regulatory initiatives as key tools to support a just transition.

¹⁸ Source: Official Journal of the European Union. Article 35 of Regulation (EU) 1169/2011 states: "To facilitate the comparability

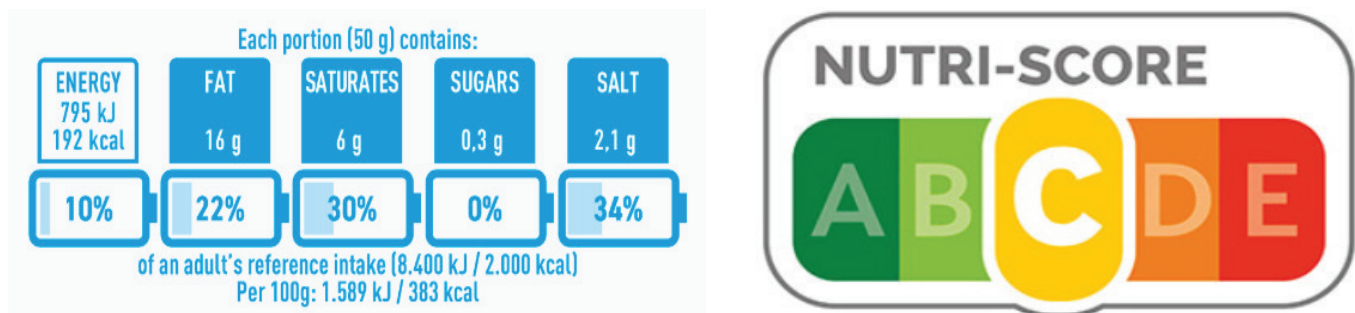


All values displayed on the labels refer to a single serving for an adult, rather than a fixed amount (such as 100 grams, as used in the Nutri-Score system). Each box contains two distinct types of information:

- In the top left corner, the energy content is indicated in Joules and Calories.
- Moving to the right, the amounts of total fats, saturated fats, sugars, and salt are displayed.

All nutrient values are expressed in grams. Below each nutrient, a battery symbol represents the percentage of the recommended daily intake for an average adult.¹⁹

Figure 3: A direct comparison between the NutrInform (on the left) and the Nutri-Score (on the right)



Source: <https://www.nutrinformbattery.it/en/home> and <https://www.santepubliquefrance.fr/les-actualites/2024/nutri-score-le-point-sur-les-nouveautes-2024>

As shown in Figure 3, the informative and communicative approach is fundamentally different, if not entirely opposed, depending on whether the goal is to direct consumer choices or to provide broader information. But, as argued earlier, in order to understand the fundamental differences between these two FoPLs, considering the informational dimension alone is far too reductive. As argued by Cochoy, ‘*The consumer looks at the products, but the products he looks at are not really products, they are packaged products. Thus, I would like to show that packaging is probably one of the most important and powerful mediators in the building of consumer choices*’ (Cochoy, 2004, pp. 205–6). Therefore, behind what may only superficially appear to be a dispute over the best way to communicate the material content of a food product lie, in reality, complex interests—primarily economic, but also political and cultural.

The approach to obesity prevention policies in France and Italy

At this point in the analysis, it is clear that France and Italy are pursuing two completely different approaches to combating obesity, with food labelling being just one of the many areas of divergence.

Let us start with a key point: according to European data, these two countries have the lowest rates of overweight and obesity at European level. Therefore, we are not dealing with contexts where the phenomenon presents profoundly different characteristics—quite the opposite. This makes them particularly interesting cases to compare.

The first major point of divergence, which we have extensively discussed, is that France adopts and promotes the Nutri-Score system, while Italy strongly opposes it and instead proposes an alternative label—NutrInform—whose communicative effectiveness is widely debated. Italy argues that overly simplistic labels are harmful and that efforts should instead focus on improving ‘food culture’. As highlighted earlier, from the perspective of

of products contained in packages of different sizes, it is appropriate to continue requiring that mandatory nutritional information be expressed per 100 g or 100 ml and, where necessary, allow additional indications related to portions. However, if the food is pre-packaged and portion sizes or consumption units are specified, a nutrition declaration per portion or per consumption unit should be permitted as a complement to the expression per 100 g or per 100 ml. Furthermore, to provide comparable information regarding portions or consumption units, the Commission should have the power to adopt rules on the expression of nutrition declarations per portion or per consumption unit for specific food categories”.

¹⁹ Source: NutrInform Battery

a sociology of packaging (Cochoy, 2002), the label risks flattening and nullifying the symbolic communicative power of packaging and marketing, areas in which Italy has invested so heavily for many years. For this reason, we have decided to explore the effective measures and the active food policies promoted and implemented by Italy while continuing to compare them with those of its French counterparts.

First and foremost, we can categorise these policies based on their target beneficiaries: young people or adults. Children and young people are the primary recipients of many food education policies. Their young age makes them more impressionable to messages, but perhaps more importantly, they are easier to reach as they are engaged in the education system. Schools serve as the main channel through which public entities and organisations implement awareness campaigns, targeted communications, and various other initiatives to promote healthy eating habits.

From this perspective, we observe that both countries implement a series of food education initiatives aimed at children. France's initiatives to combat obesity and overweight are initiated at the central level and then spread by involving peripheral government levels. Since 2001, the Programme National Nutrition Santé (PNNS) has been adopted to promote healthy lifestyles among the very young, based on healthy eating and physical activity. In addition, Décret No. 2011-1227 set binding nutritional standards for school canteens, limiting foods high in fat and sugar. Since 2005, snack and beverage vending machines have been prohibited in secondary schools, and since 2007 the law has required that television advertising for high-calorie foods and beverages be accompanied by educational messages approved by the National Institute for Health Education.²⁰ To work in a more targeted way on adults as well, the French choice has been to focus on sports, with funding aimed on the one hand at building public sports facilities and on the other at allowing access to sports facilities such as gyms even to less affluent segments of the population through medical prescription.²¹ The government has also launched communication campaigns on lifestyles. The last aspects of active policy are the regulations limiting the possibility of offering unlimited sugary drinks ('all you can drink'), enacted in 2017, and the 'sugar tax' that since 2012 applies an excise tax of €3.50 per hectolitre on all drinks with added sugars or sweeteners.²² Finally, the health service follows guidelines for early screening and referral to regional specialised centres, established in 2011, including surgical interventions for the most critical situations.

Even in Italy, the issue is widely discussed, but policies aimed at countering the rise of overweight and obesity are less uniform at the national level, more complex in terms of the institutional actors involved, and more fragmented across local territories. For example, among national institutional policies, we can mention the Ministry of Education (MIM), which in 2015 issued the Guidelines for Food Education, aiming to integrate nutritional, cultural, and environmental aspects. These guidelines seek to actively engage students, families, and educational communities in promoting healthy lifestyles. In 2024, the Ministry of Health established the Permanent National Table on Nutritional Security (TaNSiN), tasked with promoting food education by integrating health, social, and cultural aspects. TaNSiN also coordinates Regional Tables (TaRSiN) to harmonise policies across different territories. At the national level, we also find the initiatives of CREA (Council for Agricultural Research and Economics), which already in 2018 published the Guidelines for Healthy Eating, aimed at preventing overeating and obesity, particularly among children. The Department for Youth Policies also plays a role, advancing the National Prevention Plan and the 'Gaining Health' programme, which promote healthy lifestyles and proper nutrition, with a specific focus on children, adolescents, and young adults. In Italy, we also find various intermediaries and local actors involved in food education and the promotion of proper nutrition. Among these are: the Italian Network for Local Food Policies, which includes over 600 members—researchers, local authorities, and third-sector organisations—supporting Italian cities in developing and

²⁰ <https://data.worldobesity.org/#FR|I|A|F>

²¹ Il piano governativo "Sports pour tous – Génération 2024" sta investendo 300 milioni di euro (2022-2024) per realizzare 5000 nuovi impianti sportivi di prossimità, inclusi 1500; fonte: <https://www.sportspourtous.org/la-federation/projet-federal/>, accessed on 10.03.2025

²² <https://www.fiscalead.com/en/french-taxes-on-sugary-drinks-a-sweetener-free-solution-to-support-public-health/> accessed on 15.03.2025



adopting local food policies; the National Observatory on Local Food Policies, launched in 2022, which brings together 31 national institutions, including 27 universities, to monitor and promote local food policies; and the Healthy Cities Network, an association of about 70 entities, including municipalities and regional authorities, which promotes local health initiatives, including food education.

The Italian situation differs from that of France, however, when it comes to laws or obligations that apply across the entire country. For instance, the sugar-sweetened beverage tax, already active in France, was formally introduced in Italy by the 2020 Budget Law (Law 160/2019). However, its implementation has been repeatedly postponed—from 2022 to 2023, and now to July 1st, 2025, according to the latest Budget Law. By contrast, the School Catering Guidelines (issued by the Ministry of Health) are in force. These regulate the nutritional content of school meals, banning high-calorie snacks, sugar-sweetened beverages in vending machines, and foods with excessive fats or sugars. This kind of ‘institutional imbalance’ in Italy means that some territories, thanks to more proactive or attentive local institutions, have a greater impact on food education, while less active areas offer fewer educational programmes to their residents.

However, there are at least two critical aspects to consider regarding these well-intentioned food education efforts. The first issue is that, in practice, children have no real agency over what they eat at home. Parents are the ones who purchase and prepare food, and children eat according to their family’s dietary culture, which may or may not be healthy. The second crucial point is that children are actually the least affected by overweight and obesity, whereas adults experience these issues to a much greater extent. Therefore, this brings us to a key aspect to take into consideration: food education policies and healthy eating communication strategies should primarily focus on adults, who, unlike young people attending school, are more difficult to reach in a consistent and comprehensive way. This brings us back to the urgent need to view communication—and therefore FoPL—as one of the few effective tools for targeting adult citizens.

Political nature of nutritional labels

The European debate on which labelling system to adopt mainly revolves around two competing models: the evaluative Nutri-Score, proposed by France, and the informative NutriInform Battery, proposed by Italy. At first glance, the debate may seem focused solely on determining the best tool for informing consumers. However, it appears to conceal a broader economic and political confrontation, which has little to do with the technical communicative effectiveness of the labels. Instead, it seems to be driven by two key factors: The influence of agri-food industry lobbies and sector associations, which in Italy strongly oppose Nutri-Score and push for its rejection.

Italy’s stronger food culture compared to other European countries, which translates into significantly lower overweight and obesity rates among its population, as discussed in the first section.

From the perspective of the Italian Ministry of Health, the Nutri-Score system, which has been adopted by several countries—including Portugal, as of April 2024—presents multiple critical limitations and inadequacies.²³ One of the main criticisms concerns its scoring methodology, which disproportionately emphasises negative attributes of food products. Under this system:

- Negative points (up to 40 points) are assigned based on calories, sodium, sugar, and saturated fat content.
- Positive points (up to 15 points) are awarded for fibre, protein, and the presence of selected ingredients (such as fruits and vegetables).
- The final classification, based on the total score, ranges from a dark green ‘A’ (healthiest choice) to a red ‘E’ (least healthy choice).

²³ So much so that, in May 2024, the Italian Ministry of Health put forward the possibility of intervening through supervisory authorities to challenge and sanction the use of the “Nutri-Score” logo on food products marketed in Italy. <https://www.quotidianosanita.it/governo-e-parlamento/nutriscore-ministero-salute-governo-contrario-si-valutano-sanzioni-per-utilizzo-del-logo/>

As a result of this classification approach, many traditional Italian products, particularly those with protected designations (PDO, PGI, and DOC)—the most traditional and culturally embedded—receive unfavourable ratings under Nutri-Score. In other words, a synthetic and essential front-of-pack label such as Nutri-Score, precisely because of its informational effectiveness, removes from marketing the ability to influence an element such as a quality brand, because it flattens differences onto easily calculable elements (Callon, 1998). A product promoted as ‘high quality’ artisanal bears the same label as a cheap, industrial product. It eliminates, in the terms proposed by Cochoy (2004), all symbolic elements in order to focus instead on those that are easily calculable by the average consumer (Callon, 1998).

This possibility has raised concerns in Italy about the potential economic and reputational damage to its food industry, as well as the oversimplification of nutritional value, which fails to consider portion sizes and dietary context. Thus, Italy continues to advocate for the NutriInform Battery, which it sees as a more balanced and educational alternative, offering consumers detailed information without unfairly penalising traditional foods. From this point of view, an instrument of public action such as FoPLs can never be reduced to mere technical rationality; it is inseparable from the agents who use it (Lascoumes and Le Galès, 2004, p. 4). The authors further argue that instruments such as FoPLs fully belong to the category of ‘new negotiated governance’, in which the interests of the different actors involved matter—and matter all the more the greater the actors’ capacity for agency.

However, the main criticisms directed at the French system concern above all technical issues (some of which are also well founded). First of all, Italy criticises the quality rating system used by Nutri-Score.

Nutri-Score technical limits

The French system evaluates products based on a 100g serving, which, according to critics, creates a significant distortion in product classification. This is because 100g often does not correspond to a typical portion size, which may be smaller (as in the case of Parmesan cheese) or larger than this reference amount.

As a result, some foods classified as healthy under Nutri-Score (dark green ‘A’ rating) might encourage overconsumption, as consumers may be misled into thinking they can eat large quantities without concern. Conversely, products typically consumed in smaller portions—such as Parmesan cheese—receive lower ratings (‘D’ and ‘C’, respectively), which may discourage their consumption.²⁴

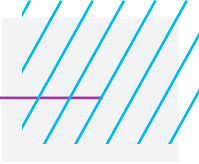
A striking example is extra virgin olive oil, which receives the same classification as a sweetened soft drink under Nutri-Score.²⁵ This comparison fails to account for realistic consumption patterns—people do not consume 100g of olive oil in one meal, whereas soft drinks are often consumed in significantly larger amounts (e.g., 330ml or 500ml cans). Additionally, Nutri-Score does not differentiate between refined seed oils and high-quality extra virgin olive oil, despite their vastly different nutritional profiles.

Furthermore, according to the Italian Ministry of Health, the Nutri-Score model focuses on individual nutrients, labelling them as either ‘positive’ or ‘negative’, rather than evaluating foods within the context of a balanced diet. This contradicts scientific consensus, which emphasises the overall dietary pattern rather than isolating specific nutrients (ISS, 2022).²⁶ Furthermore, Nutri-Score does not provide comprehensive nutritional information, such as sugar content, which is crucial for people with diabetes, and the use of colours

²⁴ Regarding olive oil, its classification improved from C to B with the modification of the Nutri-Score algorithm in 2022. To see how algorithm works: <https://www.santepubliquefrance.fr/en/nutri-score>

²⁵ In 2023, the WHO published guidelines (GL) on “non-sugar sweeteners” (NSS), advising against their use as they may pose long-term health risks, such as an increased risk of diabetes and cardiovascular (CV) diseases. Additionally, they do not appear to be effective for weight control. <https://www.who.int/news/item/15-05-2023-who-advises-not-to-use-non-sugar-sweeteners-for-weight-control-in-newly-released-guideline>.

²⁶ <https://www.iss.it/la-dieta-mediterranea>



can be misleading, as consumers may associate a green rating with a 'free pass' to consume a product in unlimited quantities, without considering its actual nutritional balance.

The NutriInform Battery alternative

As we mentioned, in response to these criteria, the Italian Ministry of Health introduced the NutriInform Battery, albeit significantly later than other EU countries implementing their front-of-pack labelling systems. Unlike Nutri-Score, NutriInform: displays numerical values for total calories, fats, saturated fats, sugars, and salt; uses a battery icon to indicate the percentage of the recommended daily intake provided by a standard portion size; does not use colours to signal the healthiness of a food product, allowing consumers to interpret the information independently. By presenting a more detailed breakdown of nutrient intake per portion, without penalising specific foods, Italy argues that NutriInform respects traditional dietary habits and avoids oversimplifications, making it more aligned with the so-called Mediterranean diet model.

The Italian labelling system is presented as a response that prioritises information and consumer education rather than mere communication. Unlike Nutri-Score, it does not label any food as 'forbidden' or mark specific nutrients as discouraged. Instead, it displays the percentage values of each component in relation to the total daily intake recommended for an average adult. The underlying assumption is that a conscious consumer will assess their food intake based on their own biological and personal characteristics. The Italian proposal seems to place great trust (perhaps misplaced) in the calculative capacity of the average consumer, 'a logical dimension that calls for our reflexive and calculative abilities' (Cochoy, 2004, p. 223).

Overall, it can be said that the Italian label is merely a revised and simplified version of the traditional nutritional table found on the back of food packaging. It does not add any simplified or easily understandable information that could be useful for the average consumer, particularly those with low nutritional literacy, and it takes for granted that all consumers are careful and aware. It is a label (and a strategy) that, by not adding any information that is more salient than what can be read on the back labels, does not undermine the power of the other three dimensions: 'an emotional dimension that bets on symbolic appeals and seduction, a sociological dimension that plays on routine and attachments [...] an axiological dimension that looks towards values, collective consciousness and the consumer's political commitment' (Cochoy, 2004, p. 223). This label, in essence, does not influence the marketing process which, especially for products with quality labels, is considered a fundamental element for Italian products.

Consistently with what has just been said, and in response to pressure from major agricultural associations and parts of the food industry, Italy has excluded the NutriInform Battery from being applied to certain packaged foods: products with packaging larger than 25 cm² and protected designation products (DOP, IGP, and STG).²⁷ This means that many traditional and high-quality Italian products—often bearing protected geographical indications—would not be subject to this labelling system.

The reasons for contestation

Alongside the Italian Ministry of Health, several other institutions have voiced their opposition to the adoption of Nutri-Score. For the Ministry of Agriculture,²⁸ there is a risk that certain sectors of primary production and agro-industry could be severely penalised by the implementation of simplified labelling. This is particularly true for the production of cheeses, cured meats, olive oils, and wines. Italy, by proposing the

²⁷ Source: Front-of-Pack (FOP) Labeling Systems to Improve the Quality of Nutritional Information for Obesity Prevention: NutriInform Battery. Michele O. Carruba et Al., Antonio Caretto, Antonino De Lorenzo, Giuseppe Fatati, Andrea Ghiselli, Lucio Lucchin, Claudio Mafeis, Alexis Malavazos, Giuseppe Malf, Enrica Riva, Chiara Ruocco, Ferruccio Santini, Marco Silano, Alessandra Valerio, Andrea Vania, Enzo Nisoli. Received: September 20, 2021 / Accepted: October 1, 2021 Enzo Nisoli (enzo.nisoli@unimi.it) Extended author information available on the last page of the article. © The authors, 2021. C_17_pagineAree_5509_3_file.pdf

²⁸ <https://www.euronews.com/health/2024/05/03/italy-to-challenge-nutri-score-with-constitution>

NutriInform Battery label, sought a compromise that aimed to protect both regional economic interests and the informational effectiveness of the labelling system. Indeed, the label was the result of the work of the Ministry of Agriculture, the Ministry of Economic Development, the Ministry of Foreign Affairs, and the Ministry of Health, in collaboration with the National Institute of Health and the Council for Agricultural Research and Agricultural Economics Analysis (CREA).²⁹

Also from a political standpoint, opposition to the adoption of the French Nutri-Score appears to be fairly bipartisan. In February 2022, the then Minister of Foreign Affairs, representing the Five Star Movement (M5S), stated that the Nutri-Score follows a logic lacking clear scientific foundations, leading to overly negative judgments: “cow’s milk, for example, receives a worse score than a sugar-free carbonated drink.”³⁰

Since 2021, all Ministers of Agriculture who have served in the government, from different and opposing political coalitions, have mobilised against Nutri-Score, arguing that Italy should present its own vision to the European Commission and push for uniform labelling rules across Europe.³¹ In the current far-right Italian government, opposition to Nutri-Score is driven by both cultural and economic reasons—mainly centred on the ‘protection and preservation of the Italian identity of food’—as well as by an anti-European international policy stance, based on the idea that Europe is pushing for agro-food standardisation.

The recognition by UNESCO of Italian cuisine as part of the Intangible Cultural Heritage of Humanity, received in December 2025, only reinforces the idea of the healthfulness, immutability, and traditional nature of Italian food: “*Italian cuisine is the ‘cuisine of affection’: it conveys memory, care, relationships, and identity, telling stories of families and communities through food. It reflects the bond between natural landscapes and communities, embodying memory, everyday life, and the culture of territories.*” As can be seen in these few lines available on the website of the Ministry of Agriculture,³² the investment that Italy is pursuing places a very strong emphasis on the symbolic and cultural—almost novelistic—dimension of food, depicting a bucolic and romantic picture that is often far removed from the productive reality of the large food industry.

However, behind the political opposition to the EU-wide adoption of Nutri-Score, there is also a strong and effective lobbying effort by trade associations in the primary sector and the agri-food industry.³³ Several major players in the Italian food sector have repeatedly expressed their opposition to Nutri-Score, such as the Parmigiano Reggiano and Grana Padano Consortia.³⁴ During the heated debate over the French labelling system, both consortia declared that they would not authorise the traffic-light labelling on the packaging of their Protected Designation of Origin (PDO) cheeses. Through these actions, the consortia aim to counter measures that might devalue their products.³⁵

AFIDOP, the Association of Italian PDO Cheeses, which brings together protection consortia safeguarding the typicality and use of denominations in the sector, shares the same opposition to Nutri-Score. The initiative by the Parmigiano Reggiano and Grana Padano Consortia has been followed by other producer consortia, which have carried out a coordinated lobbying effort to prevent Nutri-Score from being chosen by the

²⁹ Source: Antonio Pratesi and Abil Gonzalez Campos, NutriInform Battery vs. Nutri-Score: The Food Industry Against Public Health, March 14, 2022. NutriInform Battery and Nutri-Score: The Food Lobby Against Health (ilfattoalimentare.it).

³⁰ Source: Laura Saggio, Firm No from the Government to Nutri-Score. Di Maio: “Italy Opposed to the Traffic Light Mechanism”, February 15, 2022. (edagricole.it).

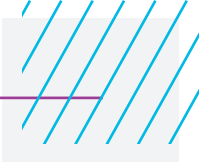
³¹ Source: Michela Cappellini, Traffic light label: Italian countermove, il sole24ore 24-02-2021, 20210224_RS_IL-SOLE-24-ORE.pdf (qualivita.it)

³² <https://www.masaf.gov.it/cucina-italiana-patrimonio-unesco>

³³ <https://www.beuc.eu/blog/food-label-ambush-how-intense-industry-lobbying-halted-eu-plans/>

³⁴ <https://www.informatoreagrario.it/filiere-produttive/zootecnia/parmigiano-e-padano-due-consorzi-contro-il-nutriscore/>

³⁵ The orange label assigned to 100g of cheese compared to the 20g recommended consumption would discourage cheese consumption without taking into account its nutritional values. Source: Consorzio Tutela Grana Padano and Consorzio del formaggio Parmigiano Reggiano, Parmigiano Reggiano and Grana Padano, the two most important Italian PDOs in Italy and in the world, together against the Nutriscore, 7 July 2021: Qualivita Foundation.



European Union as the front-of-pack label for food products. Among the actions launched by these protection consortia is a social media campaign featuring ten symbolic recipes that, in their view, represent part of the Mediterranean diet and risk disappearing with the adoption of the French label.³⁶

Other consortia have joined this opposition, including the Asiago Cheese Protection Consortium, the Consortium for the Protection of Tuscan PGI Extra Virgin Olive Oil, and the Chianti Wine Consortium.³⁷ The opposition of wine producers is even more understandable. Wine risks being seriously penalised as it would be classified as an unhealthy product, in line with the recommendations of health organisations that advise against alcohol consumption, even in small doses³⁸. However, in this case as well, a health-related argument seems to blend and overlap with an economic and production-driven motivation. The message being promoted is that of responsible wine consumption, which is associated with socialisation, culture, history, and the environmental, hydrogeological, and landscape protection of Italy.³⁹ It is clear that significant economic interests are at stake.

However, to fully understand the debate and Italy's stance, it is useful to take a broader perspective that also considers other elements. The country has invested substantial resources in the traceability, certification, and control of agri-food products with a Designation of Origin. Italy currently holds the highest number of origin labels in Europe.⁴⁰ These investments have had positive effects on regions and businesses with certified production chains, in some cases located in rural or remote areas. Many Italian agricultural enterprises have benefited from this certification process, both in terms of investments and market recognition (European Commission, 2014; Iotti et al., 2023). It is therefore understandable that, from an economic and production standpoint, there is concern that these products could be penalised by the application of an additional label such as Nutri-Score, which, from being an instrument for monitoring citizens' health (Lascombes and Le Galès, 2004), could have the unintended effect of flattening differences between products, focusing the buyer's attention on a single 'health' element rather than on the set of symbolic and cultural elements highlighted in the packaging. However, the economic repercussions would extend to a delicate socio-economic balance within the agricultural sector, particularly in more remote and rural areas, where high-quality agriculture remains one of the few surviving productive industries. While the narrative may seem excessively alarmist, it is undeniable that the economic and social effects—both direct and indirect, tangible and intangible—could manifest in a country like Italy, where the agri-food sector is a cornerstone of both production and tourism. The real challenge appears to be striking a balance between providing consumers with simple and effective communication about the nutritional values of food products while avoiding oversimplification and reducing the information solely to caloric content.

³⁶ Source: AFIDOP, Italian PDO cheeses united: Nutri-Score misleading, penalizes certified products and healthy eating, Qualivita Foundation March 15, 2022 AFIDOP: Qualivita Foundation

³⁷ Source: Asiago DOP and Olio Toscano IGP say no to Nutri-score :: Qualivita Foundation Consortium for the protection of Asiago cheese and consortium for the protection of Tuscan IGP extra virgin olive oil, "Asiago DOP and Olio Toscano IGP say no to Nutri-score.

³⁸ In the "Guidelines for a healthy diet" drawn up by CREA, the same ministerial body that curated the Nutrifarm battery, it is stated that "Alcohol, zero or as little as possible".

<https://www.crea.gov.it/documents/59764/0/LINEE-GUIDA+DEFINITIVO.pdf/28670db4-154c-0ecc-d187-1ee9db-3b1c65?t=1576850671654>

³⁹ Source: Chianti Wine Consortium: "Nutriscore yet another attack on our world, Italian MEPs must mobilize" Chianti Wine Consortium, February 8, 2022. : Qualivita Foundation

⁴⁰ <https://www.istat.it/en/tag/pdo-pgi-tsg-products/>

Conclusions: Finding the True Nature of Labels

Italy, with 12 million hectares of cultivated land (SAU), considers agriculture and its high-quality agri-food products an essential economic factor. With 327 certified products,⁴¹ the country holds a global record in PDO (Protected Designation of Origin), PGI (Protected Geographical Indication), and TSG (Traditional Speciality Guaranteed) labelling, trying to prevent through these tools the effect of ‘food from nowhere’ (Campbell, 2009). In inland, marginal, and rural areas, agriculture is the key economic driver, also boosting tourism by leveraging products with quality labels recognised by the European Union. These labels have helped establish the reputation of Italian agri-food products and serve as a ‘guarantee’ of quality for consumers who mainly shop for food in supermarkets and large retail chains.

The economic benefits derived from quality labels, which do not assess the caloric and nutritional content of food and are applied to agro-industrial food consistent with the approach of the corporate food regime (McMichael, 2013), are undeniable. However, they could be challenged by the implementation of front-of-pack nutritional labelling. The clear health message conveyed by Nutri-Score, if negative, as observed for many traditional Italian products, could discourage purchases, forcing consumers into a stark choice between ‘territorial identity’ and ‘health’ in an excessively dichotomous way. As we argued in the text, following Cochoy (2002, 2004), an effective informational label such as Nutri-Score has the capacity to neutralise the symbolic dimension of packaging and the ‘cultural’ dimension that is constructed and promoted through it. Indeed, according to Coldiretti, one of the main trade associations in the agricultural sector, nearly 85% of agri-food products classified as ‘Made in Italy’ would receive a negative rating from a nutritional standpoint.⁴²

When weighing the different needs and interests involved, it is crucial that the European Union, in selecting a labelling system to be adopted across all member states, seeks a middle ground (Fernandez-Alonso et al., 2024). This requires a careful assessment of the potential consequences such a system could have on national economies, prioritising the improvement of citizens’ diets while also considering the impact on local agricultural production. Achieving this balance calls for a detailed analysis that distinguishes the economic effects on rural and inland areas from those affecting large agri-food industries, which often have greater lobbying power and the ability to adapt their production and commercial strategies. This distinction has not been made in Italy, and major agri-food companies are able to strategically leverage both the economic appeal of territorial development and the cultural weight of tradition, exerting significant influence on policymakers and public opinion. This means understanding the political nature of this decision, which is not a technical one. What the large coalition of Italian institutions and stakeholders is claiming is that labelling rules must be situated and connected to political-economic priorities according to political and cultural choices. The recognition by UNESCO of Italian cuisine as part of the Intangible Cultural Heritage of Humanity, received in December 2025, is the result of years of work by various national institutions that emphasise the symbolic and cultural dimension of food in promoting products, territories, and agri-food supply chains.

At present, it is extremely difficult, if not impossible, to quantify the economic impact that adopting a label like Nutri-Score might have. Any estimates of potential damage to Italy’s economy, or that of other countries, remain speculative. For this reason, we propose shifting the focus to other key aspects: first, acknowledging the diverse interests of all stakeholders involved, including farmers and smallholders; second, educating and informing consumers on how to correctly evaluate food quality and interpret nutritional labels while also promoting the importance of a balanced diet complemented by physical activity, challenging corporate food regime practices; third, launching an awareness campaign to highlight that consumer choices are not only about daily food consumption but can also affect rural and agricultural communities, as well as secondary industries connected to the primary sector; finally, it would be essential to encourage consumers to actively support businesses that prioritise environmental sustainability and contribute to the economic, social, and

⁴¹ <https://www.politicheagricole.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/2090>

⁴² <https://www.coldiretti.it/salute-e-sicurezza-alimentare/nutriscore-a-rischio-85-prodotti-made-in-italy>



cultural well-being of entire regions.

Italy's concerns regarding Nutri-Score are valid and, to some extent, shared by others. However, they appear weak when contrasted with the fundamental goal of front-of-pack labelling: to provide clear and accessible information on a product's nutritional value in a food buying system dominated by large-scale retail. Nutri-Score's focus on discouraging the consumption of certain nutrients linked to obesity and overweight leaves little room to highlight the beneficial components of the same food. Moreover, using a standardised measurement unit, such as 100g or 100ml, for all foods and beverages might seem like a practical choice, but it creates distortions when applied to products with vastly different nutritional profiles, such as olive oil and sugary soft drinks. On the other hand, Italy's proposed alternative, using the recommended daily intake for an average adult, is also arbitrary. It fails to consider factors such as age, gender, lifestyle, or existing health conditions. In this sense, every approach has its strengths and weaknesses. This demonstrates that labels are not neutral tools, insofar as they are shaped by underlying priorities and assumptions embedded in the agents who design and adopt them (Lascoumes and Le Galès, 2004).

Perhaps the most empirically sound criticism Italy raises against Nutri-Score is that it does not take into account how a product is made. The system does not differentiate between foods that undergo heavy industrial processing and those that contain artificial additives like preservatives or chemical sweeteners. This is a significant limitation: by focusing purely on the presence of certain nutrients, the system fails to capture other critical factors that contribute to a product's overall quality.

Ultimately, relying on front-of-pack labelling as a shortcut risks absolving European states of the responsibility to foster critical thinking in their populations. Instead of reducing consumer choices to a simplistic traffic-light system, policymakers should focus on empowering individuals to make conscious, well-informed dietary decisions. Rather than relying only on simplified labels, a more effective solution might be investing in widespread nutritional education, enabling consumers to make informed decisions based on their personal needs and the detailed information already available on product packaging. This would avoid the FoPL's reduction of the multitude of stimuli consumers are exposed to at the point of purchase, as mentioned above.

The debate surrounding Nutri-Score highlights a fundamental challenge: how to provide consumers with clear and effective nutritional information without oversimplifying or penalising traditional, high-quality products. While labelling systems aim to promote healthier food choices, they must also take into account cultural, economic, and territorial factors, especially in a country like Italy, where food is deeply tied to identity, tradition, and local economies. Rather than a rigid opposition to Nutri-Score, the real objective should be to develop a labelling system that ensures transparency while respecting the complexity of food products and dietary habits. A possible solution could be a more nuanced approach that integrates nutritional guidance with portion recommendations, contextualising food consumption rather than categorising it in absolute terms.

At the heart of the issue is the need to reconcile public health objectives with the protection of high-quality agricultural production, particularly in rural areas where these sectors are crucial for economic sustainability. The path forward should not be a clash between economic interests and health policies but rather a collaborative effort to develop a labelling system that informs consumers while preserving the value of traditional products.

In this article, with its limitations—specifically the focus on only two countries, the absence of empirical evidence on consumer responses, and the lack of data related to the real economic effects of labelling—we have explored how Front-of-Pack labels do not merely inform consumers about food. On the contrary, they enact a specific vision of health, responsibility, and citizenship, redefining the relationship between bodies, markets, and territories.

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