



## Joint response to UK consultation on front of pack nutrition labelling

### Introduction

As organisations working to improve public health we welcome the opportunity to respond to this consultation. Many of us have long campaigned for the introduction of a single front of pack nutrition labelling scheme including traffic light colour coding for energy plus four nutrients (fat, saturates, sugars, salt and energy) in the UK.

We commend the Government's decision to seek views on how to maintain and extend the use of labelling and increase consistency in labelling in line with research on what consumers find most useful. We urge the UK Government to recommend traffic light labelling is used consistently on front of pack across all appropriate products as a result of this consultation. The House of Lords Science and Technology Committee recently

concluded that the evidence shows traffic light labelling best meets the needs of consumers<sup>1</sup>.

We have responded to those questions of most relevance to improving public health. If you would like further information about this response please email Mubeen Bhutta, Policy Manager at the British Heart Foundation at bhuttam@bhf.org.uk or call 020 7554 0158.

**I) To what degree does your organisation believe that greater consistency in UK FoP labelling would be beneficial to consumers? Is your organisation willing to work with the UK Governments to achieve this?**

While greater consistency in front of pack food labelling across the UK could have a considerably beneficial impact on the public, it is unclear what is meant by consistency in this consultation. We would welcome a recommendation for all food companies to consistently apply a scheme including traffic light colours, as recommended by the FSA.

However, a consistent scheme that standardises use of confusing or unhelpful labels would impede rather than improve public health. Consistency should not take priority over providing labels which consumers can use and understand most effectively.

Poor diets contribute significantly to the onset of heart disease, type 2 diabetes and some types of cancer. Diets high in fat, sugar and salt and low in fruit and vegetables account for around 30% of all coronary heart disease and 5.5% of all cancers in the UK are linked to excess bodyweight. Being overweight or obese is a major risk factor for these diseases, and obesity levels are increasing across the UK - around a fifth of adults in Wales and a quarter of adults in England, Scotland, and Northern Ireland are obese today<sup>2</sup>.

Front of pack nutritional labelling enables consumers to understand what's in the food they are buying and helps them to take greater personal responsibility for their food choices. Front of pack labelling also incentivises manufacturers to reformulate products for a healthier profile. Research indicates that more consistency would enhance use and comprehension of front of pack labels and that the strongest labels are those which combine traffic light colours and the words high, medium and low<sup>3</sup>.

We are committed to working in partnership with the UK government to achieve greater consistency in front of pack labelling, in line with the evidence on the scheme that consumers find most useful. Many of us have engaged with the Food Standards Agency and departments of health across the UK on food labelling and would welcome the opportunity to continue to do so. We could have an important role to play in promoting the single scheme to our respective members and supporters, including through engagement with the mainstream media. We could utilise our collective and substantial communication channels to support and promote a Government recommendation which incorporates consistent traffic light colours and the words high, medium and low.

**II) If you are not a food retailer or manufacturer, please provide your views on the current provision of FoP labelling in the UK**

There has been much debate in the UK on food labelling and robust research to identify the best scheme. It is therefore disappointing that there continues to be such variation in the UK market. Furthermore, some of the companies that have not moved towards the label that

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<sup>1</sup> House of Lords Science and Technology Committee (2011) Behaviour Change

<sup>2</sup> Welsh health Survey 2009, Statistics on obesity, physical activity and diet: England, 2012, Scottish Health Survey 2010, Health Survey Northern Ireland 2010/11

<sup>3</sup> BMRB (2009) Comprehension and use of UK nutrition signpost labelling schemes, report prepared for the Food Standards Agency

would be most useful to consumers – a combination of traffic light colours, the words high, medium and low, and percentage guideline daily amounts – have sought to perpetuate myths about the traffic light scheme, for example suggesting that red labels ‘demonise’ food when the purpose of the scheme is to help consumers make informed food choices. The Government has a key leadership role to play in communicating the aims of front of pack nutrition labelling, including traffic light colours, to the public.

The sooner the government is able to issue a robust recommendation for all food companies to use the single integrated label, the sooner people can be empowered to make informed dietary choices, and to identify healthier choices at-a-glance.

**III) In what circumstances do you think it might be appropriate to give an energy declaration alone FoP, instead of energy, fat, saturates, sugars and salts? Please detail the reasons for your views**

It is vital that all five nutrients are included on all front of pack labelling. Energy alone is not sufficient to provide consumers with the information that they need to make informed choices<sup>4</sup>. For example, individuals could be consuming within recommended daily calorie limits but exceeding limits for saturated fat and salt if they are not given this full information. Many consumers who are living with health conditions, or with risk factors for conditions, may be more concerned about particular nutrients<sup>5</sup> so it is essential that they have the at-a-glance information they need to manage the impact of diet on their health.

We believe that labels containing information for energy plus four nutrients should be available for as wide a selection of products as possible. Previous research undertaken by the Food Standards Agency confirmed that consumers find front of pack labelling most helpful on composite, processed foods<sup>6</sup>.

**V) Currently FoP labelling in the UK is based on ‘per portion’ The FIR permits expression of FoP information per 100g or per portion, but where per portion information only is provided, energy should be provided per 100g in addition. Views are sought on whether per portion remains the right basis for consistent FoP declarations.**

Traffic light colour coding, as proposed by the FSA, is primarily based on per 100g data (100ml for drinks), with an additional per portion criteria for red traffic lights<sup>7</sup>.

However, information on a per portion basis is useful for consumers as it removes the need for detailed calculations to determine the amount that would be consumed. We therefore recommend that traffic light colour coding criteria is based on per 100g and per 100ml, as recommended by the FSA, but that the amount of each nutrient present is given per portion on pack.

However, the Government should ensure that the final recommendations for a consistent scheme enable meaningful comparison between different products and avoid the use of subjective or unrealistic portion sizes. This should include creation of a list of standard portion sizes for use in the UK similar to the list of Reference Amounts Customarily Consumed developed by the US Food and Drug Administration. Previous research has

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<sup>4</sup> BMRB (2009) Comprehension and use of UK nutrition signpost labelling schemes, report prepared for the Food Standards Agency

<sup>5</sup> BMRB (2009) Comprehension and use of UK nutrition signpost labelling schemes, report prepared for the Food Standards Agency

<sup>6</sup> Food Standards Agency (2007) Front of Pack Nutritional Signpost Labelling Technical Guidance

<sup>7</sup> Food Standards Agency (2007) Front of Pack Nutritional Signpost Labelling Technical Guidance

showed that, when unrealistic portion sizes are used, consumers call into question the reliability of front of pack labels and may be discouraged from using them in the future<sup>8</sup>.

**VIII) The FLABEL study indicated that consistency in positioning of the FoP label also played a part in gaining consumer attention. Views are sought on the degree to which position on pack could be harmonised.**

While harmonisation of the position on pack may help to ensure that consumers are aware of where to look for nutritional information, the most important issue is ensuring that the label provides information in a format that is the most useful to consumers. While consistency in positioning across specific product lines may be helpful to consumers, this should not be at the expense of use of the most helpful label format.

**IX) Views are sought on whether % Reference Intakes (%GDAs) should be used on all FoP labels.**

Research shows that traffic light colours and high, medium and low text are the most important factors in achieving high levels of comprehension so it is vital that these are used on all front of pack labels<sup>9</sup>.

There are a number of problems with use of percentage guideline daily amounts on their own:

- It is not clear to consumers that GDA values for fat, saturated fat, sugars and salt represent a maximum amount that they should try to stay within, not a target to aim for.
- GDA displays are based on arbitrary portion sizes
- Standard GDA signals lack colour coding for quick consumer appraisal and interpretation and some retailers confusingly use colours to differentiate the types of nutrient rather than the levels of those nutrients<sup>10</sup>.

**X) Given current market practice, and the research on consumer preference, a move towards more consistency would require most interested parties to make some changes alongside the changes that would be required by the FIR. Views are sought on interested parties' preference for the following options for a single approach:**

- **%GDA only**
- **%GDA + HML text + interpretative CC based on standardised nutrient levels**
- **%GDA + HML text**
- **%GDA + interpretative CC based on standardised nutrient level**
- **Colour coding only**
- **Colour coding + %GDA**
- **Colour coding + HML text**

There is a clear evidence base for the system that works best for UK consumers – a label that includes traffic light colour coding, high, medium and low text, with the optional addition of percentage guideline daily amounts<sup>11</sup>. It is disappointing that this question asks about preference for a single approach when previous research has shown which label the

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<sup>8</sup> BMRB (2009) Comprehension and use of UK nutrition signpost labelling schemes, report prepared for the Food Standards Agency

<sup>9</sup> BMRB (2009) Comprehension and use of UK nutrition signpost labelling schemes, report prepared for the Food Standards Agency

<sup>10</sup> National Heart Forum (2007) Misconceptions and misinformation: the problems with Guideline daily Amounts (GDAs)

<sup>11</sup> BMRB (2009) Comprehension and use of UK nutrition signpost labelling schemes, report prepared for the Food Standards Agency

government should be recommending companies move towards. Decisions must be made on the basis of what is most understandable to consumers, not the preferences of food manufacturers.

**XI) Do you have any alternative suggestions that might fulfil the Government's ambition to see a more uniform approach to FoP labelling?**

As stated above, there is a clear evidence base for which scheme consumers find most helpful. A uniform approach to front of pack labelling must not reduce the opportunity to promote and increase the use of the label that is most useful to consumers.

**XII) If your business already provides FoP information, what form of FoP labelling do you use and why? Do you have any research that supports your choice of FoP scheme that you would be willing to share? We are particularly interested in research that:**

- **Addresses consumer preferences, consumer understanding and comprehension (particularly amongst lower literacy and lower socio-economic groups, those of different ages, disabilities, long term conditions, gender, race, religion or belief, pregnancy and maternity**
- **Demonstrates any impact on consumer choice**
- **Demonstrates any effect FoP has had on the reformulation of food products**

There is an existing evidence base for which scheme best meets the needs of UK consumers. The Department of Health should be aware that evidence provided by food manufacturers is likely to seek to reinforce their existing position, and should therefore ensure that it is robust and significant.

We commend the request for evidence of schemes that meet the needs of the whole population. Food labelling must not widen dietary inequalities by failing disadvantaged consumers, those who are less numerate or for whom English is not their first language. Only a fifth of the population have sufficient numeracy skills to achieve a good GCSE in maths according to the Skills for Life Survey<sup>12</sup>. Critically, traffic light labels perform significantly better than labels without colours across all socio economic groups<sup>13</sup>.

The inclusion of traffic light colours and the words high, medium and low in a combined label (with the optional addition of percentage guideline daily amounts) helps to overcome difficulties some consumers may have with interpreting nutrition labelling<sup>14</sup>.

**XIII) If your business uses interpretive additional forms of expression, such as HML text and/or colour coding, how do you determine the cut-off points between each category? Does this differ between types of food, or are the same criteria applied to all your FoP labelled products, and, if so, why?**

The traffic light scheme as recommended by the FSA has clear criteria for green, amber and red boundaries for fat, saturated fat, salt and sugars<sup>15</sup>. These criteria should be applied to a consistent scheme across all manufacturers and retailers.

The Department of Health should also move to eliminate the use of colours other than traffic lights as these are confusing for consumers. Evidence suggests that consumers assign

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<sup>12</sup> Department for Business, Innovation and Skills (2011) The Skills for Life Survey

<sup>13</sup> BMRB (2009) Comprehension and use of UK nutrition signpost labelling schemes, report prepared for the Food Standards Agency

<sup>14</sup> BMRB (2009) Comprehension and use of UK nutrition signpost labelling schemes, report prepared for the Food Standards Agency

<sup>15</sup> Food Standards Agency (2007) Front of Pack Nutritional Signpost Labelling Technical Guidance

health values to non-signposting colours when, in fact, these colours are applied by manufacturers using only percentage guideline daily amounts arbitrarily<sup>16</sup>.

**XIV) The FLABEL research recommends the use of health logos accompanied by repeat nutrition information as a form of labelling that might provide a way forward in delivering a consistent form of FoP labelling across the EU for the future. Interested parties' views and experience of using health logos are sought**

Front of pack labelling schemes which include only a 'Keyhole' style healthy eating logo fail to provide information on individual levels of nutrients such as saturated fat and salt. Research shows that consumers want to see this latter type of information<sup>17</sup>. Therefore the immediate priority has to be individual nutrient labels - keyhole type logos, whether at a UK or EU level, should only be considered in addition and after wider consideration of appropriate criteria.

**XV) What are your views on further emphasising the energy content per portion of the FoP in order to help those looking to reduce their calorific intakes?**

As detailed in response to question III), provision of energy content is not enough to enable people to correctly identify healthy choices<sup>18</sup>. Emphasis of calorie content could be a distraction from the information about each of the key nutrients. Furthermore, national surveys indicate that population intake of salt, saturated fat and non-milk extrinsic sugars exceed recommended limits<sup>19,20</sup>. In addition, as stated above, portion sizes can be subjective and unrealistic as they are not currently subject to any uniform criteria.

**XIV) Are there any costs or benefits other than those set out in the costs and benefits section above that might accrue from the further voluntary harmonisation of the provision of front of pack nutrition information as set out in this consultation document?**

It is disappointing that no attempt has been made to quantify the health benefits from introducing a consistent front of pack labelling scheme. As stated above, poor diet is a major factor in many chronic diseases. A 2006 regulatory impact assessment examining the introduction of front of pack nutrition labelling estimated that 18,000 lives could be saved in the UK per annum if the ambition to reduce salt, saturated fat and sugar intake were achieved.

While front of pack nutrition labelling is only one part of the picture in terms of facilitating healthy food choices, the impact assessment noted that even if only 1% of the benefits in the table were achieved as a result of signpost labelling then this would generate benefits in excess of £200 million per annum<sup>21</sup>.

A recent cost effectiveness review into diet and healthy eating interventions found that front of pack nutritional labelling including traffic light colours, coupled with a national social

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<sup>16</sup> BMRB (2009) Comprehension and use of UK nutrition signpost labelling schemes, report prepared for the Food Standards Agency

<sup>17</sup> BMRB (2009) Comprehension and use of UK nutrition signpost labelling schemes, report prepared for the Food Standards Agency

<sup>18</sup> BMRB (2009) Comprehension and use of UK nutrition signpost labelling schemes, report prepared for the Food Standards Agency

<sup>19</sup> DH (2012) Assessment of Dietary Sodium Levels Among Adults (aged 19-64) in England, 2011

<sup>20</sup> DH (2010) National Diet and Nutrition Survey: Headline results from Years 1 and 2 (combined) of the Rolling Programme (2008/9 – 2009/10)

<sup>21</sup> <http://www.food.gov.uk/multimedia/pdfs/signpostingria.pdf>

marketing campaign to inform the population on how to interpret the labels would be cost saving over the lifetime of the population<sup>22</sup>.

The use of traffic light colour coding may also prompt reformulation from food manufacturers. Evidence submitted by Sainsburys and Asda to the House of Lords Science and Technology Committee indicated that traffic light labelling increases the demand for healthier foods<sup>23</sup>. This may in turn stimulate manufacturers to reformulate their products to achieve a healthier profile – and colour code – to meet this demand<sup>24</sup>. It would be useful for the cost benefit analysis of consistent front of pack labelling to take account of potential resulting reformulation, using evidence provided by retailers who are already using the traffic light scheme.

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<sup>22</sup> [http://www.liv.ac.uk/PublicHealth/obs/publications/report/89\\_diet\\_prev\\_prog\\_FINAL.pdf](http://www.liv.ac.uk/PublicHealth/obs/publications/report/89_diet_prev_prog_FINAL.pdf)

<sup>23</sup> House of Lords Science and Technology Committee (2011) Behaviour Change

<sup>24</sup> National Heart Forum (2007) Misconceptions and misinformation: the problems with Guideline daily Amounts (GDAs)