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Re: Nutrition labelling - European Commission's request for information in view of the revision of Council Directive 90/496/EEC

Thank you for offering Consumers' Association (CA) the opportunity to input into the UK's response to the European Commission's request for information on nutrition labelling. I understand from Judith Holden that you are still accepting comments. I am sorry that they are so late.

How the current legislation works in practice

The Food Standards Agency is hopefully familiar with our views on nutrition labelling as set out in several briefings and magazine articles that we have produced. Copies of these are enclosed.

Our view is that nutrition labelling should be mandatory on all pre-packaged foods. We consider that this must include the full eight nutrients (energy, protein, carbohydrate, sugars, fat, saturates, fibre and sodium) if it is to be meaningful to consumers. This level of information is needed in order to be able to make informed and healthy food choices and to implement healthy eating advice.

We are therefore concerned that at the moment nutrition labelling is voluntary and only has to be provided if a nutrition claim is made. Even then, this does not have to include the full eight nutrients.

While it is the case that many manufacturers and retailers of own-brand products voluntarily provide nutrition information on products, many still do not. Examples of products which either provide no nutrition labelling at all or merely the basic four nutrients are included in our briefings. In many cases,

these products tend to be the more unhealthy products i.e. those that are high in fat, sugar or salt.

We therefore hope that this long over-due revision of the nutrition labelling directive will result in the provision of full nutrition labelling on all foods. Consumer research that we carried out in 2000¹ also highlighted that consumers value nutrition labelling: 89 per cent of respondents agreed that *'It is important that nutrition information is shown on all food products'*.

Considerations for future revision of the Directive

While the current legislation does include a prescribed format for when nutrition labelling is provided, we are concerned that in many cases, even when it is provided, nutrition labelling is not very user-friendly for consumers. This has also been reinforced by our consumer research: 55 per cent agreed that *'I find it difficult to work out from the nutrition information on food products what is good for me and what is not'* and 85 per cent agreed that *'nutrition information panels should be laid out in the same way on all food products.'*

Examples of problems we have previously identified include: poor legibility e.g. Small or unclear print, in some cases it can be difficult to actually find the information on the packaging and the terminology used can be confusing to consumers.

Issues that must be addressed in relation to presentation of the information include:

- a standardised, easy to read and understand format based on consumer research findings as to what is most helpful to consumers
- the lettering must be clear from the background and ideally be black lettering on white
- there should be a minimum size of lettering
- the typeface should be standardised
- the use of terminology should be reviewed to ensure that it is consumer-friendly.

We also consider it essential that guideline daily amounts are included in order to help consumers make sense of the information. Many manufacturers and retailers are already providing these on a voluntary basis for calories and fat and others are also including salt.

It is important that figures for nutrients are rounded in order to avoid suggesting a level of accuracy that is not achievable. We consider that it would be most useful if information had to be provided per serving and per 100g/100ml. This enables consumers to be clear about what they are actually likely to eat, but also to make comparisons with other products more easily.

Careful consideration must also be given to the accuracy of the information provided and as the Commission has raised the issue of tolerances. This is an issue that we highlighted some time ago in Which?. The article is also included in case it is still useful. We agree that a common definition and method of analysis for fibre is needed and have previously sent comments on this issue.

Consistency with other legislative initiatives

On a more general issue, we have concerns that other Commission regulatory initiatives are also relevant, but are being handled in isolation. A preliminary draft proposal on the addition of vitamins and minerals and other substances has recently been published, for example, which is proposing to require nutrition labelling to be mandatory for such products. Similarly, the preliminary draft proposal on health

¹ 984 adults aged 15 plus were interviewed in their homes between 5-11 May 2000

and nutrition claims also suggested that nutrition labelling would be required should a claim be made. It is important that any initiatives relating to provision of nutrition labelling are therefore dealt with consistently.

I hope that these comments are useful. Unfortunately, we have not carried out any research ourselves recently on the format that is likely to be most useful to consumers. Please let me know if you have any queries or would like to discuss any of these issues in more detail.

Sue Davies
Principal Policy Adviser