

Consultation response: A voluntary front of pack sign-post labelling scheme

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SUMMARY

- > Which? strongly supports this initiative by the Food Standards Agency (FSA).
- > We fully support the option that the FSA is proposing - the multiple traffic light.
- > We believe that the FSA research to develop this model has been comprehensive, transparent and has provided an opportunity for all of the main stakeholders to input into the development of a simplified labelling scheme.
- > It is essential that a consistent labelling format is used across all brands if consumers are to be able to easily identify which products are high in fat, sugar and salt and compare between different products.
- > We are concerned that the majority of food manufacturers and retailers do not appear to want to support a single, consistent system of signposting and are instead developing a plethora of different schemes based on different formats, criteria, symbols and use of colours. This will only add to consumer confusion.
- > The introduction of the scheme must be backed up with government communication promoting why it has been introduced and how to use it.
- > Once finalised, the FSA must effectively promote the multiple traffic light and monitor uptake by the food industry.



GENERAL COMMENTS

Which? welcomes this opportunity to comment on the FSA's proposal for a front of pack nutrition labelling scheme to help consumers make healthier choices.

We fully support this initiative and consider that the introduction of simplified sign-post labelling on front of pack is a key measure that will help consumers to more easily identify foods high in fat, sugar and salt and therefore make informed food choices.

A simple sign-post labelling scheme should not substitute for the nutrition information panel on the back of pack. We believe that full nutrition labelling should be mandatory on all food products and hope that the review of the nutrition labelling directive expected in 2007 will provide an opportunity to ensure this and also to improve the presentation and usability of the information. Simple sign-posting should, however, be provided in addition to this and should serve as a quick and easy way of telling how much fat, sugar and salt a product contains. Consumers looking for more specific information about particular nutrients should be able to find this from the nutrition information panel on the back of the pack.

We have been particularly concerned at the way manufacturers and retailers are introducing their own 'simplified' labelling schemes in advance of publication of the FSA's final model. These schemes take different formats, for example, different symbols, criteria, lay out and use of colour. We believe that this proliferation of schemes will only serve to increase consumer confusion and make it difficult for consumers to compare between products produced by different manufacturers and retailers. We strongly support the introduction of a single government backed scheme which we hope can be used across all brands. It is clear from the FSA's research that consumers also strongly support the introduction of a standardised visual front of pack sign-post labelling scheme developed and controlled by an independent and authoritative body such as the FSA.

We believe that the development of a sign-post labelling scheme needs to be promoted in the context of the other measures set out in the Government's 'Choosing Health' White Paper and Food and Health Action Plan to tackle the barriers that make it difficult for people to eat more healthily. A consistent scheme used by all manufacturers and retailers would enable the promotion of consistent messages and communication and also enable linkages with other initiatives, including the Government's work on social marketing. As set out in the Regulatory Impact Assessment, a simple, transparent sign-posting scheme will also work as a driver for product innovation and reformulation.



We welcomed the opportunity to input into the research conducted by the FSA to develop the most useful and best understood sign-post labelling model as part of a stakeholder group that included representatives from across the food industry. It is very disappointing that despite this opportunity to input into the FSA's research methodology and the models presented, companies represented on this group have still decided to develop their own separate models. We are concerned that this appears to have more to do with seizing a short-term marketing opportunity rather than trying to come up with the optimal solution for health promotion.

We hope that these companies will review their positions in light of finalisation of the Government's scheme and opt instead to help consumers by taking a consistent approach across the industry.

We therefore believe that it is essential that the FSA continues to promote the scheme, monitor its uptake and publicise schemes that are inconsistent with the findings of the Agency's research and have the potential to mislead consumers as to how much fat, sugar or salt a product contains in relation to dietary guidelines.

We believe that the FSA research was very comprehensive and therefore the scheme that proved to be most helpful to consumers, the multiple traffic light (MTL), should be the scheme that the FSA promotes.

SPECIFIC QUESTIONS

Choice of sign-posting format

The FSA research involved testing the different labelling formats with 2,676 consumers across England, Scotland, Wales and Northern Ireland. Prior to this, two other phases of consumer research helped to refine the formats to be presented. It was particularly important that the research not only assessed which model consumers favoured, but also which model they could most effectively use to identify the levels of fat, sugar and salt within a product and also between different products. Even if consumers say that they like the look of a model, it will serve little purpose if it proves more difficult for them to use. This would go against the whole purpose of the scheme which is ultimately to try and encourage people to think more carefully about how much fat, sugar and salt they consume.

Based on this research, we support the conclusion that the multiple traffic light (MTL) should be the chosen model. This is because:

- > The research showed that this model performed best in helping consumers determine whether a single product was high, medium or low in fat, saturated fat, sugar or salt.



- > This model also performed well in helping consumers choose between options. Although the colour coded guideline daily amount (CGDA) model performed slightly better in this respect (92% correct responses compared with 86% for MTL), it did not perform anywhere near as well for identifying the fat, sugar and salt content of a single product (69% correct responses compared with 90% for the MTL).
- > The colour coding aspect came out as being important to consumers.
- > The research highlighted that many consumers were not familiar with the GDA concept. While these findings need to be addressed, they again support use of the simpler MTL model.
- > The majority of people interviewed found the MTL easy to use and understand and a wide range of consumers were able to use it correctly.

Nutrients and nutritional criteria for colour coding

We agree with the choice of nutrients (fat, saturates, sugar and salt) and the banding criteria that have been developed. We agree that it is appropriate to include a per portion criterion for foods that are intended to be eaten in quantities of 100g or more. If this is not included, consumers will be given a misleading impression of the fat, sugar and salt levels they will be consuming when eating products such as ready meals.

We understand the practical difficulty of basing sugar criteria on non-milk extrinsic (NME) sugars as it is not possible to analyse for these. However, it is these sugars that we need to eat less of. We are represented on the expert group looking at a GDA for total sugars and welcome this opportunity. It is important that this work focuses on the way in which the GDA will be used, the types of products that sign-posting will apply to and the public health objective. An approach, therefore, needs to be found that does not discourage consumption of fruit and vegetables, but also is not overly generous in setting a total sugar GDA so that consumers are given a misleading impression of the significance of sugar levels in manufactured products which are most likely to be coming from added sugar. If the total sugar GDA is too generous, products that are high in NME sugars will appear healthier than they are.

Back of pack information on Guideline Daily Amounts

We believe that GDAs are very helpful for consumers and need to be more effectively promoted. While the MTL labelling scheme would help consumers to gain an easy indication as to how significant levels of fat, saturates, sugar and salt are in a particular product compared with what they should aim to eat in a day, more detailed information about GDAs would also be very useful. We are pleased that many manufacturers and retailers are already starting to provide this information.



Products to be sign-posted

We agree that it is sensible to phase in a new labelling scheme. However, we would ultimately like to see the scheme applied across all pre-packed foods. We are concerned that important categories of foods are missing from your proposed list of products where sign-posting would be introduced in the first instance. Biscuits, cakes, confectionery and snack foods should also be included. These are products that generally are high in fat, sugar or salt. Failure to include them when other products carry the sign-post labelling could also suggest to consumers that they do not need to think about how much fat, sugar or salt they contain.

We also believe that the FSA needs to give more consideration to how a sign-post labelling scheme could be applied within the catering and food-service sector given that people increasingly eat out. Our consumer research published in April 2005 in our report 'What's really on the menu?' highlighted that many people would value more information about the nutritional quality of food when eating out.

Draft guidance

It is important that the FSA makes it clear that the introduction of this signpost labelling scheme is an important aspect of the Government's efforts to improve the quality of people's diets and therefore to reduce the incidence of obesity and diet-related disease. While the legal situation means that the scheme has to be voluntary, we hope that the Government will make it clear that its advice is that industry should apply the scheme to its products.

Communication and promotion

It is essential that the introduction of the scheme is supported by on-going and co-ordinated communication and promotion.

Regulatory impact assessment

We have no additional issues to raise on the regulatory impact assessment.

CONCLUSION

We strongly support the introduction of a simple sign-post labelling scheme and support the use of the multiple traffic light model as this performed best in the FSA's research. The Government made a commitment to deliver on this in the Choosing Health White Paper and the Food and Health Action Plan. Failure to



deliver on this, based on the findings of the FSA's research, would undermine people's ability to make informed choices and improve the quality of their diets. It is important that the FSA promotes the scheme and that industry supports it instead of developing different schemes that will only add to consumer confusion.

We hope that our comments are helpful and would be happy to discuss them further if that would be useful.

Which?
6th February 2006