



**Consumer
Focus**
Campaigning for a fair deal

Consumer Focus response to the Food Standards Agency's consultation on Front of pack (FOP) nutrition labelling for pre-packed foods sold through retail outlets in the UK

November 2009

About Consumer Focus

Consumer Focus is the statutory organisation campaigning for a fair deal for consumers in England, Wales, Scotland, and, for postal services, Northern Ireland. We will be the voice of the consumer, and work to secure a fair deal on their behalf. We were created through the merger of three consumer organisations – Energywatch, Postwatch and the National Consumer Council (including the Welsh and Scottish Consumer Councils). The new approach allows for more joined- up consumer advocacy, with a single organisation speaking with a powerful voice and able to more readily bring cross-sector expertise to issues of concern.

Consumer Focus Scotland also hosts the healthyliving award and Community Food and Health Scotland.

www.consumerfocus.org.uk

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Consumer Focus welcomes the opportunity to contribute to the Food Standards Agency consultation on front of pack (FOP) nutrition labelling for pre-packed food sold through retail outlets in the UK.

Responses to specific questions

Please find Consumer Focus response to specific questions posed in the consultation.

1. We welcome your views on the range of foods to which an integrated FOP label should be applied, including suggestions for a limited number of exemptions?

Consumer Focus believes that the label should be on as wide a range of food as possible with an exemption only for single ingredient products. The label is useful information for the consumer on the nutritional content. Exemptions for some food categories such as cheese and hams would seem inappropriate given the variation in key nutrients of these products.

2. We welcome your views on the proposal for including calories in an integrated FOP label and that interpretive elements should not be included?

Research suggests that consumers do find calorie labelling useful. Since any colour coding criteria are likely to be developed in line with nutrition and health claims resulting in most products likely to be coded amber (medium) it would seem inappropriate to colour code for calories.

<http://www.food.gov.uk/multimedia/pdfs/quantannexa.pdf>

<http://www.focusbiz.co.uk/webinars/eufic/paneuropeanlabelresearch/europe/>

3. Should the Agency develop specific criteria for an integrated FOP label for foods recommended to be eaten in small portions, to be used alongside the per 100g criteria and specific criteria for large portions? If so what should these criteria be? Or could foods recommended to be eaten in small portions be dealt with in other ways?

It is important that consumers can assess the healthiness of products regardless of the portion size. A 100g approach enables consumers to make comparison between products and is a clear signal about whether a product is high, medium or low in key health critical nutrients and avoids any possible consumers' misapprehension when products are consumed in greater quantities than envisaged or more frequently.

4. Do you agree with the proposed approach to improve communication and understanding of saturated fats in an integrated FOP label? If not, why not?

Consumer Focus agrees with this approach.

5. In light of EFSA's recent opinion on the sugars GDA for nutrition labelling purposes, we would welcome your views on the appropriate sugars GDA figure that should be used on an integrated FOP label?

Consumer Focus has been involved in discussions within BEUC, the European Consumers Organisation on this. BEUC is calling for clarification from EFSA over its position on the food industry's guideline daily amount for sugar. EFSA endorsed the GDA front of pack labelling system earlier this year in March supporting the 90g of sugar a day as the recommended maximum.

However in a draft opinion published for consultation in August on sugar intake, the same panel, the NDA (Dietetic products, nutrition and allergies) said there should be no limit set for sugar intake. The panel stated that 'available data do not allow the setting of an upper limit for total or added sugars, neither an AI nor a recommended intake range.'

BEUC is calling for an upper limit for **added sugars only** to be set at less than ten per cent of energy which is in line with recommendations by FAO/WHO. Consumer Focus endorses this view.

It is unfortunate that added and natural sugars are not differentiated by EFSA's recent opinion and that it is based on the assumption that an individual consumer eats five portions of fruit and vegetables per day which does not reflect the reality of European fruit and vegetable consumption patterns.

6. We would welcome your views on whether the salt thresholds for an integrated FOP label should be revised and if so which of the approaches discussed above should be used:

- (a) changes to the per 100g criterion,**
- (b) changes to the per portion criterion, or**
- (c) both**

Consumer Focus believes that there should be alignment between FOP salt thresholds and the nutrient profile threshold to be established under the Regulation (EC) 1924/2006 on Nutrition and Health Claims and also with the eventual EU Regulation on Food Information to the Consumer. Therefore any review of current UK salt thresholds would seem premature. We believe that the FSA should continue with its current salt reduction programme, working with manufacturers to continue lowering the salt in products.

7. The proposed advice on prominence and labelling on the Agency's current technical guidance can be found in Annex D. We welcome your views on how this might be revised to maximise the visibility and legibility of an integrated FOP label.

Consumer Focus welcomes in depth consumer research to test legibility amongst a range of consumers. However, it is important that the label is not allowed to be excluded (on smaller sized packages for example) and we would not want to see packs changed in order to avoid nutritional labelling.

8. We welcome your views on how government and stakeholders could work in partnership to raise consumer awareness and understanding of a single integrated FOP label (targeting those consumers that are not currently using FOP labelling and in particular C2DE's those aged 65 years and families with children). We would welcome any information regarding initiatives or activities that have been undertaken in this area?

Supermarkets provide a wide range of customer information and advice such as leaflets and magazines, signage and advice in store from staff. They also have websites and national telephone help lines. These are all avenues that could be used. One of our predecessor organisations the National Consumer Council published a series of reports rating the UK top retailers and in Cut Price-What Cost? asked about front of pack labelling when looking at the indicator for customer information and advice¹.

For several years Food Standards Agency Scotland has run a competition inviting Scottish schools to design posters, for use in a calendar, promoting key Agency messages. This year the competition is being run jointly with Consumer Focus Scotland and there have been over 4000 entries. The competition whilst being for school children also gets messages into the home and could be a useful way of raising awareness of FOP labelling to families with children. The messages will also reach grandparents and carers.

In Scotland the healthyliving award scheme and in Wales the Healthy Options Award which work with caterers to provide healthier choices are possible vehicles for engaging with the wider public. Likewise the Scottish Neighbourhood Shops project where retailers are encouraged to develop their fresh produce and healthier offerings.

The broader use of media should also be considered such as women's magazines and cookery and food programmes.

¹ Cut-price, what cost? How supermarkets can affect your chances of a healthy diet . National Consumer Council 2008

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