

**Front of Pack Signpost Labelling**  
**FDF response to FSA's Update following Agency Board discussions**  
**13 April 2006**

## **1. Food and Drink Federation**

*FDF represents the UK food and drink manufacturing industry, the largest manufacturing sector in the UK.*

FDF members are food and drink manufacturing companies, large and small, and trade associations supporting specific food and drink sectors. FDF helps manufacturers operate in an appropriately regulated marketplace and to maximize their competitiveness. We communicate our industry's values and concerns to a range of audiences in the UK and abroad, including to Government, regulators, consumers and the media. We work in partnership with other main players in the food chain to help ensure our food is safe and that consumers can have confidence in it.

### **The Industry We Represent**

The UK food and drink manufacturing industry:

- has a turnover of over £66 billion, accounting for 14.8% of the UK's total manufacturing sector
- employs some 500,000 people, around 13% of the UK manufacturing workforce
- exports about £10 billion of food and drink, of which 65% goes to EU countries
- imports about £22 billion of food and drink, of which 68% comes from EU countries
- buys some two-thirds of all the UK's agricultural produce

## **Front of Pack Signpost Labelling**

### **FDF response to FSA's Update following Agency Board discussions**

#### **GDA's and Traffic lights**

FDF's position on the most appropriate way in which to give consumers information about the food they eat is well known. FDF members are committed to GDA-based information which gives objective information on which consumers can make informed choices about the appropriateness of individual foods in their diet. FDF's recent 'Delivering on Our Commitments Report' revealed that £15bn worth of products will have GDAs on pack by the end of 2006.

This consensus on GDAs has enabled several companies to develop consistent, complementary approaches to providing prominent on-pack information, including on front of pack. The front of pack GDA-based scheme which several FDF members have launched, has elements similar to the FSA recommendations:

- Separate information on key nutrients
- Provision of information on the levels of nutrients present in a portion of the product.

However, as indicated in our previous response to Signposting, FDF members do not support the proposal for traffic light colour coding which indicates whether the key nutrients are high, medium or low in absolute terms. FDF sees traffic lights as too simplistic, subjective and potentially misleading. Such schemes tend to suggest foods are 'good' or 'bad' rather than help consumers fit them into a more balanced diet. Those FDF members rolling out front of pack GDA-based signposts will be putting them on a wide range of products, not just those highlighted by FSA.

#### **Nutritional Criteria for Signposting Scheme**

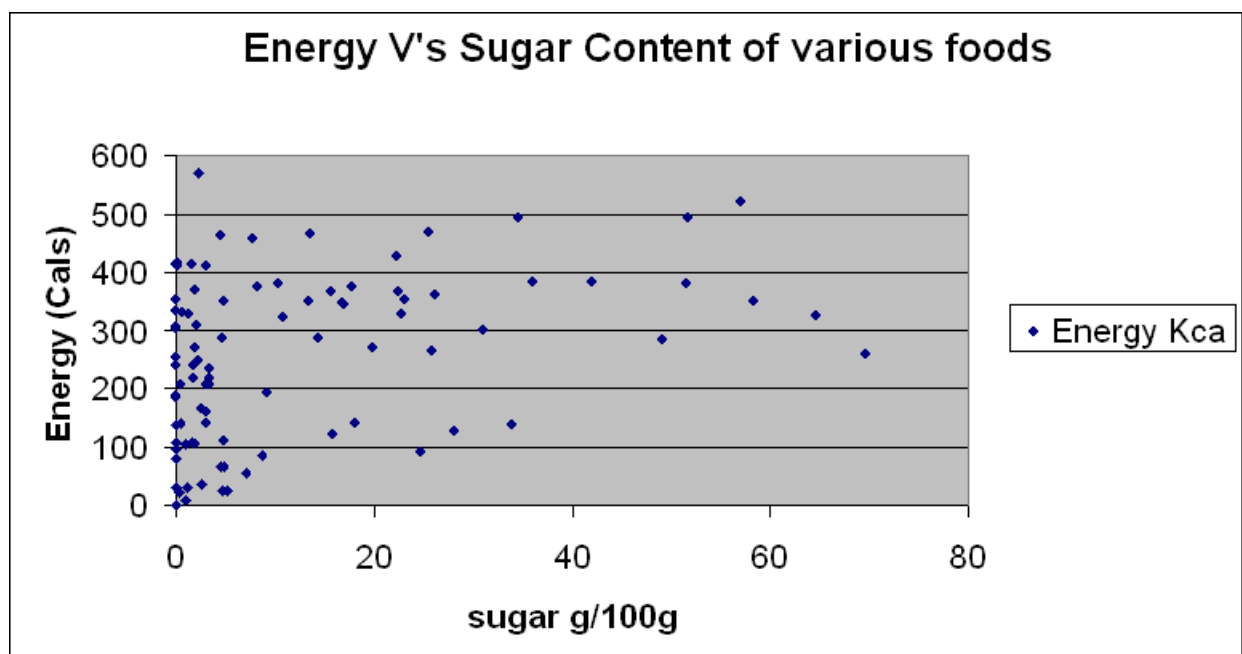
FDF members do not intend to use the traffic light scheme, so discussions on the criteria for such a scheme are not relevant to us. Our consumers will see consistent GDA values being used by FDF members.

#### **Review of the Sugars GDA**

Although FDF members do not intend to use a traffic light labelling scheme, FDF does have views on the proposed setting of a different and lower GDA for total sugars. FDF does not feel that the setting of a 60g total sugars GDA value is appropriate for manufactured signposted foods, for the reasons given below:

- A GDA value should apply for the whole day and to all products. It is confusing to have one GDA value for use in some circumstances but not in others. There would be a loss of transparency to the labelling of the sugars signpost and potential confusion amongst consumers.
- The 90g sugars GDA has been worked out logically and scientifically based on an intake of 2000 kcals.
- The 90g GDA is consistent with values set in other countries, and with the value set by CIAA.
- If a product is particularly aimed at children, manufacturers have been encouraged to use the children's GDA for labelling purposes so that it is clear that children require proportionately less sugars than adults.
- FDF is not aware of any adverse health affects associated with consuming a diet with a total sugars content of 90g. With regards to tooth decay, it is the frequency rather than the quantity of sugar, which affects the risk of caries.

- If consumers are taking note of their GDAs, a 90g total sugars level will not lead to the consumption of a high energy dense diet. This is because they will also be made aware of the calorie and the fat GDAs; both of which will help to ensure that consumers are aware of the energy density of a particular food they are eating.
- Sugars, whether naturally present in a food or added, are metabolised in exactly the same way by the body. FSA has accepted that NMES is a difficult concept for use on labelling and therefore should not promote a 60g total sugars GDA as the route to achieving a NMES restriction.
- Most food manufacturers who will be using a GDA signposting scheme will use it on a wide range of products. Including products with significant levels of fruit, vegetables and milk, e.g. fruit-based desserts, vegetable-rich ready meals, soups, yogurts and fruit-based drinks. It is therefore appropriate that industry uses a GDA which is appropriate for the whole diet. FDF believes that IGD's GDA for sugars is the more appropriate for use across the whole diet.
- When the 15g/100g criterion for 'high' total sugars is used as the benchmark for high sugars, anomalies result. For example, using an example of a product FSA propose should carry traffic lights, 'no added sugar muesli', would be classified as high sugar because of its dried fruit and milk powder content.
- The simple solution to ensuring that consumers do not get the majority of their sugars from sources which do not include fruit, vegetables and/or milk is to educate them about diet and the importance of balance, variety and moderation. Educating consumers about GDAs will also involve the use of healthy eating and lifestyle messages, including the need to have at least 5 helpings of fruit and vegetables every day. Setting a 60g sugars GDA for the labelling of manufactured food is too convoluted to be effective as a means of encouraging people to eat more fruit and vegetables,
- Industry is committed to developing new products with health benefits. This would include products with significant amounts of fruit and vegetables. Setting a 'high sugars' cut off at 15g/100g would deter the innovation of products with a high fruit content.
- FDF disputes the idea that total sugars levels in manufactured foods are an indication that the food has a high energy density and/or low nutrient value:  
Energy density is not associated with NMES content but is associated with moisture content. For example; vegetable oil, and cream crackers are very energy dense but have sugar contents of 0g/100g and 0.05g/100g respectively.  
The graph below illustrates this further as it shows no association of sugar content with energy.



Similarly, a food with a high NMES content does not necessarily mean that it has a poor nutrient content; foods which contain dried or cooked fruit, fruit juices and some cereal products are examples of this - they are both high in NMES and yet are excellent sources of vitamins and minerals.

### **Conclusion**

FDF members do not intend to implement the FSA's recommendation to adopt a traffic light signposting scheme, and a GDA signpost scheme is being adopted by several FDF members. FDF considers that GDAs are the more appropriate basis for consumer information as they are not subjective and encourage consumers to understand more about the foods they are eating and how to balance their diet.

FDF does not believe that the setting of a lower total sugars GDA for manufactured products is logical, scientifically valid or helpful to consumers.

FDF welcomes FSA's initiative to work with stakeholders to conduct an independent assessment of the impact of signpost labelling schemes on consumer behaviour. FDF believes that the true test of a signposting scheme is whether or not it has influenced consumers to change their eating behaviour in a positive way, not simply the selection of one product versus another, but by improvements in their overall diet. Evidence on this will only become available if appropriate surveys are done, using reliable methodology and at a time when sufficient products are available to consumers carrying signposting.

## The UK Food and Drink Manufacturing Industry

The Food and Drink Federation (FDF) represents the food and drink manufacturing industry, the largest manufacturing sector in the UK, employing over 500,000 people. The industry's annual turnover is over £69bn. It purchases some £11bn worth (about two thirds) of UK agricultural produce and imports a further £21bn worth of food and drink products, of which £46bn is unprocessed and £10bn is lightly processed. UK food and drink exports in 2004 were almost £10bn.

The following Associations are members of the Food and Drink Federation:

ABIM	Association of Bakery Ingredient Manufacturers
ACFM	Association of Cereal Food Manufacturers
BCA	British Coffee Association
BCCCA	Biscuit, Cake, Chocolate and Confectionery Association
BOBMA	British Oats and Barley Millers Association
BSIA	British Starch Industry Association
CFA	Chilled Food Association
CIMA	Cereal Ingredient Manufacturers' Association
EMMA	European Malt Product Manufacturers' Association
FA	Food Association
FOB	Federation of Bakers
FPA	Food Processors' Association
GPA	General Products Association
ICF	Ice Cream Federation
IDFA	Infant and Dietetic Foods Association
MSA	Margarine and Spreads Association
NABIM	National Association of British and Irish Millers
NACM	National Association of Cider Makers
SB	Sugar Bureau
SIBA	Society of Independent Brewers
SMA	Salt Manufacturers' Association
SNACMA	Snack, Nut and Crisp Manufacturers' Association
SPA	Soya Protein Association
SSA	Seasoning and Spice Association
UKAMBY	UK Association of Manufacturers of Bakers' Yeast
UKTA	UK Tea Association

Within FDF there are the following sectoral organisations:

FF	Frozen Food Group
LDT	Lifestyle and Dietary Trends Group
MG	Meat Group
ORG	Organic Food and Drink Manufacturers' Group
SG	Seafood Group
VEG	Vegetarian and Meat Free Industry Group
YOG	Yoghurt and Chilled Dessert Group