FDF response to FSA’s consultation on a voluntary front of pack signpost labelling scheme for the UK
8 February 2006

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
Introduction and Summary

The food industry is committed to helping consumers construct a balanced diet for themselves by appropriate use of labelling which is backed by consumer education. As FSA is aware, there is clear agreement across the food industry – both manufacturers and retailers – that Guideline Daily Amounts (GDAs) are the most appropriate basis for providing improved nutrition information to consumers.

FDF’s ‘Delivering on Our Commitments Report’ (September 2005) revealed that £15bn worth of manufacturers’ products will have GDAs on pack by end of 2006.

This consensus on the use of GDAs enables companies to develop consistent, complementary approaches to providing prominent on-pack information, including on the front of packaging. A number of FDF members are launching such GDA based schemes.

By contrast, FDF believes that any colour coded labelling scheme aimed at distinguishing certain nutrients in a food as high, medium or low is simplistic and potentially misleading to consumers. Such schemes do not offer additional information to consumers about what is in their food nor do they provide a guide to eating a balanced diet.

FSA states that it has been working to develop a scheme ‘which helps consumers make informed choices and construct a balanced diet’ (Appendix 1 of the signposting report (page 1). To date, despite consumer research, the FSA have not provided us with any evidence that the front of pack signposting scheme achieves this, their first
and main aim. There is no way to know what effect the FSA’s proposal will have on the resultant diet of consumers or whether this will lead to cost savings in healthcare as alluded to in the Regulatory Impact Assessment (RIA).

Consumer testing of the traffic light scheme showed that a red traffic light was clearly perceived as indicating caution and appeared to be taken more notice of than green. Implying simplistic judgements about individual foods may have serious consequences for the acceptability to consumers of many food and drink products, including those which provide a significant amount of essential nutrients to the diet. It will not encourage or assist individuals to consume an appropriate balanced diet.

Consumer education is key: enabling all individuals to be familiar with GDA values will promote further understanding of how to construct a balanced diet based on individual requirements.

**Answering FSA’s Questions**

1. *Do you agree that on the basis of the information provided the Agency should recommend the MTL format as being the most suitable for a UK voluntary front of pack signposting scheme? If not, why not and which format would you prefer and why?*

FDF does not agree. A number of food manufacturing companies have done extensive consumer testing that has shown that GDAs are the more appropriate tool. Indeed, in general terms, FSA’s own research confirms that the GDA based approach was understood and was most popular among consumers.

As an example, research carried out by Cadbury’s showed that:

- Initial response to a traffic light type scheme was very positive, providing an ‘at a glance’ comparison between products
- However, with further and more detailed exploration, consumers failed to see how it would be of benefit in their daily lives due to the lack of specificity
- Consumers found traffic lights to be too highly prescriptive and judgemental and disliked the fact that it offered no guidance on frequency and amounts
• Rather than enabling positive choices, the traffic light scheme was seen as attempting to restrict choices, acting as an enforcer rather than an enabler of food choices and consumers could not see how it was relevant to specific personal agendas.

• Consumers wanted a scheme which could provide guidance and education and empowered them to make their own informed choice. They also wanted a scheme which was open, inclusive and positive in tone.

The research conducted by FSA only tested the ability of consumers to understand the traffic light concept but it did not test whether consumers could use it to choose an overall balanced diet that would be appropriate for their own requirements. The research also did not test whether the signposting scheme led to any health improvements as is presumed in the RIA.

Further comments on the FSA research are given in Appendix 1 of this response.

FSA’s own work points to the need to have numerical figures in the form of GDAs in order to help consumers make informed decisions and demonstrates that traffic lighting is viewed as simplistic.

The qualitative research carried out by FSA highlighted certain aspects of food that consumers found important; these included “quality”, “free from additives and flavourings”, “rich in vitamins and minerals”. The traffic light scheme of labelling does not address these concerns, dwelling only on some of the macronutrient and salt content of food.

The qualitative work undertaken by FSA showed that consumers felt that ‘if the product had a lot of red coding (i.e. more than two), the product may be considered too unhealthy, and be rejected in favour of an alternative’. Red was clearly perceived as indicating caution and appeared to be taken more notice of than green. While this may be the desired outcome, it may have serious consequences for the acceptability to consumers of many food and drink products, including those which provide a significant amount of essential nutrients to the diet. And such a scheme will not
encourage, or assist, individuals to consume a balanced diet made up from a wide range of foods.

Building a balanced diet for oneself involves much more than just being able to tell which product has, for example, more fat than another. The ultimate test would be to see whether traffic lights help individuals build a balanced diet appropriate for themselves.

FDF notes that the FSA research backed the concept of having GDA numbers, especially when comparing two products. It appears that the FSA is proposing MTLs over GDAs mainly ‘because they performed best among minority groups’ in certain tests (Point 20 in Appendix 1 of the consultation). This seems both illogical and counter-intuitive. FSA’s agenda is to improve the health of the whole population and it would therefore seem more appropriate to promote a scheme which provides better information for the majority, and couple this – as industry is proposing – with an education campaign which will help the minority who are currently less familiar or comfortable with GDAs.

2 Would you adopt the proposed signposting format? If not, why not?
The food and drink manufacturing industry will not adopt the proposed signposting format for a number of reasons:

- Industry’s own consumer testing (see 1 above) concludes that MTLs will not work.
- The scheme is too simplistic. All food is made up of a number of different nutrients in varying amounts; a food’s nutritional ‘worth’ cannot be assessed simply by its fat, sugar and salt content; food also provides other macronutrients, as well as micronutrients, trace elements, antioxidants, phenolic compounds, fibre, etc. as well as providing a source of pleasure. Indeed, many foods that would carry several red or amber traffic lights also provide many of these other nutrients: e.g. cheese, nuts, olive oil and foods containing a high proportion of these ingredients. An individual who is concerned about getting balance in their diet (i.e. a diet which provides them with all the essential requirements for the body to function at its best) could therefore be misled by taking note of the traffic light scheme.
• MTLs fail to give information about the adequacy of an individual’s diet over time. For example, a background categorising scheme that classifies energy dense foods as ‘less healthy’, may not be sending the right message for an active adolescent boy with a high energy requirement.

• Major nutritional renovations such as sodium, fat or sugar reductions are not reflected by the MTL scheme. Lowering nutrient levels does not generally take the product down from a red to an amber or from an amber to a green. For example, both 80% and 30% mayonnaise are red for fat; fat spreads, with percentage fat as low as 23%, are still classified as red for fat. This is clearly unhelpful to consumers who are trying to make choices within specific food categories. There is also less incentive to make such changes as reformulation will not impact on the traffic light signpost. Factual, numerical information on nutrient content (including GDAs) does show the reduced levels in comparison with other products.

• Research has shown that consumers are motivated by positive messages, not prescriptive ones.

• There is an assumption by FSA that putting traffic lights on food will encourage consumers to move away from eating foods with red traffic lights to eating more foods with green traffic lights - it is further assumed that these will be those high in fruit, vegetables, iron and calcium (para 7 Appendix 2 of the consultation). There is absolutely no evidence to suggest such a radical, population-wide behaviour change will result. Further, many foods that carry a red traffic light for fat, salt or sugar, are very good sources of these nutrients, for example breakfast cereals, meat dishes, meat or fruit pies and cheese based products.

3 Would you adopt your preferred format on front of pack? If not, why not?

There is no indication that any of our members will use the MTL scheme. This is because we believe it is too simplistic and potentially misleading as outlined in 2) above.

FDF members are committed to GDAs as the basis for improved nutrition information across the industry. FDF’s Delivering on Our Commitments report published in
September 2005 revealed that £15bn worth of products will have GDAs on pack by end of 2006.

This consensus on the use of GDAs enables companies to develop consistent, complementary approaches to providing prominent on-pack information, including on the front of packaging.

4 Do you agree with the banding criteria proposed in Annex 2 of Appendix 2? If not, why not?
FDF does not believe in categorising nutrients into traffic light colours in order to impart simplistic judgements on a food as outlined in 2) above.

It should also be noted that such a scheme does not adequately take into account the portion size or the frequency of consumption of the food.

5 If you disagree with any of the low band criteria please make a case for alternative levels which could be submitted to the European Food Safety Authority (EFSA)
FDF opposes the principle of assigning cut off levels to nutrients in foods for the purpose of labelling with traffic lights.

We note however, that the low banding proposed is based on regulatory guidelines and not on nutritional science.
6  Do you agree that the sugar criteria should be based on total sugars? If not, why not? If you think non-milk extrinsic sugars (NMES) or added sugar should be used please indicate how analytical and tractability difficulties could be addressed?

FDF does not support the setting of traffic lights for the sugar content of foods. Additionally, we do not support the concept of NMES for a number of reasons which have been outlined in previous submissions to the FSA.

FDF supports the use of a sugar GDA of 90g, based on total sugars. The establishing of this total sugar GDA is outlined in the IGD GDA technical report\(^1\).

7  Do you think that the Agency should also recommend provision of back of pack information on GDAs as developed by the IGD if not, why not?

There is clear agreement across the food and drink industry that GDAs should be the basis of improved nutrition information. The scheme developed by the IGD is robust because it is based on sound science and has been rigorously developed. Outlined in Appendix 2 of this response are some key statements which demonstrate the scientific rationale that lies behind GDAs and how their use is being proposed by industry while Appendix 3 lists some of the advantages of the GDA scheme.

Paragraph 11 of Appendix 1 of the consultation states that: “The research findings indicated that consumers were not familiar with the GDA concept”. Paragraph 29 of the same Appendix also states that: “The research also indicated a low level of understanding of the term Guideline Daily Amounts, and suggested an alternative description might be more helpful. This is contrary to the recent qualitative consumer research conducted by the research agency ‘mmr’ (August 2005) on GDAs for IGD which shows that that almost two thirds of the sample were familiar with the term ‘Guideline Daily Amounts’ on food products and that most respondents correctly

identified GDA as being a ‘Guide to the amount of nutrients a person should be eating in a day’.

Although FSA is encouraging the use of GDAs on back of pack, because of the consumer desire for factual information, it is not clear how consumers would be able to tie in the very objective GDA information with the very subjective and simplistic MTL scheme.

Do you agree that signposting should be introduced in the first instance on ready meals, breakfast cereals, pizzas, sandwiches and meal components such as burgers, sausages, pies, breaded, coated or formed meat, meat alternative, poultry and fish products (see para 6 of Appendix 2)? If not, why not? Please make alternative proposals.

FDF rejects traffic light signposting.

As already noted, the food industry will apply GDAs across the widest, practical range of products with supporting off-label information. Equally industry is taking the initiative across a wide range of product categories, to consider complementary approaches to on-pack information including on the front. We believe that this will help to increase consumer familiarity and understanding.

The definition of PARNUTS products should exclude them from being subject to the proposed signposting scheme as they are not intended for normal consumption by the average consumer. Indeed, the principle that PARNUTS products are differentiated from foodstuffs for normal consumption in terms of nutrition claims (into which category signposting labelling could be included) is recognised at EU level in the PARNUTS directives.
9  Do you have any comments on the proposed guidance?
These are included in our comments above

10  Do you have any comments on the information provided in the partial RIA?
The RIA assumes that widespread improvements to the health of consumers will ensue as a result of traffic light labelling. There is no evidence to indicate what the possible outcome would be. There may be no effect at all or there could also be negative effects such as people becoming more obsessive about their food, or choosing to reject certain foods which were providing them with many essential nutrients. Impact evaluation could be done through dietary survey results such as NDNS, but it may be very difficult to tease out whether changes in dietary trends are not due to other factors, especially if trends already show improvements in the diet such as reduced fat intakes.

11 Please provide details of what costs and benefits you anticipate your organisation will incur as a result of the introduction of voluntary signpost labelling. You may wish to bear in mind the following points:

a)  It would be helpful if you could differentiate between one-off costs (such as those incurred by redesigning labelling) and ongoing or recurring costs.

We feel that the cost quoted for a label change is grossly under estimated in the RIA. A simple label change for one line would cost in the region of £50K (estimated for 4+ Stock Keeping Units (SKUs) under the same brand). FDF believes it is important to state these figures to show that despite the cost to the industry we are prepared to do this to improve our nutritional labelling where appropriate.
b) **Think about what indirect costs or benefits you may incur (e.g., will there be any ‘knock-on’ effects not currently considered by the RIA)**

Nothing to add.

c) **Are there areas in which costs and benefits may arise that are not currently discussed in the RIA?**

The benefit of introducing the FSA proposed signposting scheme is very difficult to estimate, especially as there could be negative consequences such as consumers not getting sufficient energy or nutrients because they aim for foods labelled mostly green. As no work has been done to estimate how such a scheme will impact on dietary habits, the financial savings made for health improvements as a result of traffic lights cannot be estimated.

In order to start to estimate the cost of success, FSA need to clarify exactly what is the objective of traffic light labelling. This does not come across clearly in the consultation.

d) **Finally, are there any areas in which the new requirements will impact on small businesses in particular?**

Nothing to add

12 We are interested in what you thought of this consultation and would therefore welcome your general feedback on both the consultation package and overall consultation process. If you would like to assist us to improve the quality of future consultations, please feel free to share your thoughts with us by using the ‘Consultation Feedback Questionnaire’ which is attached in Annex A.

Nothing to add
Appendix 1
The FSA testing asked consumers to make a judgement on a single food and to compare between two foods using the criteria of total fat, saturated fat, salt and sugar. It is hardly surprising that the majority of consumers found that they were able to rate nutrients in a food as high medium or low according to the colour symbol. This association of red with high, amber with medium and green with low is in practice one of the major weaknesses of the scheme.

FSA claimed that the research showed that without the help of colour coded traffic lights, consumers could not judge whether a food item was high, medium or low in the four nutrients. However, as the response was to be judged against a necessarily subjective FSA view of what is high, medium and low, it is unfair to assume that there is a specific right or wrong response.

FSA’s own qualitative research concluded that with the MTL scheme: “The lack of numbers or explanation of the source of the information led to a degree of confusion (as consumers were not sure what High, Medium or Low meant in terms of levels of nutrients)” and: “Some respondents felt that the MTL concept did not provide specific enough information to allow them to make a choice of product that would help achieve a balanced diet.” Of the scheme which uses GDAs, the FSA research concludes that: “CGDA is often considered more comprehensive and credible due to the inclusion of numbers, which help consumers feel that they have made an informed decision.”
Appendix 2

Key statements which demonstrate the scientific rational that lies behind GDAs and how their use is being proposed by industry:

- GDAs are based on the predicted daily consumption of an average consumer eating a diet conforming to Committee on Medical Aspects of Food Policy (COMA) report on Dietary Reference Values.² For salt the recommendations of the Scientific Advisory Committee on Nutrition³ were followed and for total sugars the calculations used were as described by Rayner et al, 2003.⁴ They are therefore based upon, and are consistent with, the latest published scientific data on dietary requirements and recommendations and have been developed in consultation with recognised experts in nutrition.

- GDAs are derived from Government population targets as described above and are based on a series of scientific calculations as described in a detailed technical report.⁵.

- Guideline Daily Amounts (GDAs) help consumers make sense of the nutrition information provided on food labels. They translate the science into consumer friendly information, providing guidelines on pack that help consumers put the nutrition information they read on a food label into the context of their overall diet.

- GDAs are guidelines for healthy adults and children about the approximate amount of calories, fat, saturated fat, carbohydrate, total sugars, protein, fibre, salt and sodium required for a healthy diet.

- Because people vary in many ways, such as size and activity levels, GDAs cannot be used as targets for individuals, but they provide a benchmark against which the contribution from macronutrients, fibre and salt per serving of a food product can be roughly assessed.

- It is acknowledged that it is very difficult, if not impossible, for an individual to achieve the GDAs for all nutrients in any one day. This is not the purpose of

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providing this information but the aim is to provide a guide for consumers to assist them in making appropriate dietary choices. For example, they can use them as a basis against which to judge the contribution of fat made by a particular food product to their diet.

- For children it is important to acknowledge that requirements for nutrients vary according to the age of the child. Particular care therefore needs to be taken to ensure that GDAs are not considered as targets for individual children. As with the GDAs for adults they provide an approximate guide.

- GDAs may appear on pack, at point-of sale, in leaflets, in product literature, in advertisements/advertorials, magazine articles and on web-sites. They are also a useful benchmark for product and menu development.

- Consumer should be encouraged to use GDAs, to choose foods for a balanced diet and to ‘Know your GDA for……….’
Appendix 3
The advantages of the GDA scheme

- Consumers can see at a glance what their average dietary requirements are, and use this information to help them plan their meal, and see how it fits into a balanced diet.

- Consumers are already familiar with the concept of GDAs: research by IGD’s consumer information group at the end of 2004 indicated that consumer awareness of the GDA scheme is high, with 72% of consumers claiming to have seen them (Institute of Grocery Distribution 2004). And as indicated above, most recent research indicates that two thirds of consumers are familiar with the concept.

- GDAs are now gradually being accepted in the EU and CIAA has already issued GDA guideline figures. As many industry members are Europe wide, it is important that a scheme is adopted which can be recognised and accepted in the EU setting.

- Because the GDA label indicates the portion size, this can also act as a guide to a consumer and may help people to avoid serving themselves a larger portion size than is suggested!

- Although a GDA scheme, like any other new labelling scheme, will require backing by consumer education, it will actually provide opportunity to encourage consumers to eat a varied balanced diet. A subjective profiling/categorising scheme such as traffic lights would also require education back-up, but such a scheme would not directly be teaching consumers about eating a variety of foods in the right proportions, appropriate to their needs.

- FSA appear to be suggesting different cut-offs and standards for different schemes (such as the profiling scheme), so that foods are acceptable within one scheme and not another. These setting of different standards could ultimately lead to consumer confusion. However, such issues do not arise when GDA schemes are used which are based on COMA evidence, as opposed to cut-offs which are subjective and not based on nutrition science.
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 Dietary 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