

# FRONT OF PACK LABELLING: format set to become more consistent



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## HISTORY

The UK has been a front runner in establishing access to 'at a glance' front-of-pack nutrition information as the norm when we do our weekly supermarket shop, to supplement the back-of-pack nutrition information commonly found on foods. Over the past few years three distinct approaches have become widespread, each with their supporters and detractors. One is characterised by so-called multiple traffic lights via which the presence in a food of substances of concern in the UK diet – fat, saturated fat, sugars and salt – is flagged using red, amber and green icons. The history of the voluntary scheme dates back to 2006, when the Food Standards Agency (FSA) recommended that businesses adopt additional front-of-pack nutrition labelling, using traffic light colours to interpret levels of these four constituents in seven categories of food (sandwiches and similar products; ready meals (hot and cold); burgers and sausages; pies, pastries and quiches; breaded, coated or formed meat/poultry/fish; pizzas and breakfast cereals)<sup>1</sup>. The scheme or a version of it has been applied more extensively by a number of supermarket chains. Nutritional criteria are used to determine the colour coding. The cut-offs for green/amber have been set at levels consistent with health claims legislation and the amber/red (medium/high) boundaries are based on existing advice for fat, saturated fat, sugars and salt, using 25% of recommended intake levels

per 100g and 30% (40% for salt) per portion<sup>2</sup>. The scheme includes a slightly different set of criteria for non-alcoholic drinks.

The second approach, widely adopted by food manufacturers and some supermarkets, uses comparisons with guideline daily amounts (GDAs); GDAs are derived from UK dietary reference values and similar values have been established by the European Food Safety Authority, known as labelling reference values (EFSA 2009). The original GDA approach did not incorporate red/amber/green colour coding. A third approach amalgamates traffic light coding and GDAs and has been growing in popularity.

No studies examining the various schemes have seriously grappled with their ability to effect change in consumer behaviour. In 2009, the FSA commissioned research that focused on three key content-related signposting elements: traffic light colours, interpretative text (high, medium, low) and percent GDA information. The aim was to establish which front-of pack-labelling format or which combination of elements best facilitated the accurate interpretation of key nutritional information, such that consumers were assisted in making informed choices about the foods they purchase. The research addressed three key questions. First, how well do individual schemes (or elements of schemes) enable consumers to correctly interpret levels of key nutrients? Second, how do consumers use front of pack labels in real-life contexts in the retail environment and at home?

Third, how does the co-existence of a range of front of pack label formats affect accurate interpretation of front of pack labels?<sup>3</sup>.

The research found that levels of comprehension of the different formats tested were generally high (ranging from 58% to 71% when looking at single products), but two formats were particularly favourable. One combined text (the words high, medium, low), traffic light colours and percent GDA. This achieved comprehension of 70% and was one of the top two preferred formats. The other, with a comprehension of 71%, combined text and traffic light colours. The balance of evidence favoured a hybrid approach that combined GDAs, traffic light colours and text, which has been used by several major retail chains for some time. Expressed preference alone for a format was not a reliable indicator of ability to comprehend the information provided.

## GOVERNMENT ANNOUNCEMENT ON FRONT-OF-PACK LABELLING

New European legislation, the Food Information Regulation (FIR), came into force at the end of 2011 and makes mandatory (from 2016) the provision of nutrient composition data 'back-of-pack' and also includes provision for additional voluntary declarations of specified nutrients front-of-pack (either energy alone or a combination of energy, sugars, fat, saturated fat and salt). To

prepare for implementation of aspects of the Regulation in the UK, a consultation was held in 2012 about the approach for front-of-pack declarations, focusing on the lack of consistency of the formats in current use and the impact of this on consumer understanding and usage. The details of the consultation, which concluded on 6 August 2012, have yet to be made public but on 24 October 2012, Health Minister Anna Soubry and other health ministers announced that the UK governments will work towards a consistent (still voluntary) front-of-pack scheme based on a hybrid approach combining GDAs (%GDA) and colour coding. It was stated that the approach already had the support of the 10 leading retailers in the UK and the government wished to agree the details of the scheme by early 2013. The announcement also listed aspects about which there were inconsistent responses in the consultation, such as whether to include high/medium/low text in the scheme, whether to colour code energy, and where the various thresholds for colour coding foods should be set (ie should the existing FSA thresholds be adopted or was there another approach that would be preferable?). Another aspect often highlighted is that as the FSA scheme applies the criteria on a 100g basis, it penalises

foods consumed in small amounts.

Although a number of retailers already base their schemes on the FSA criteria, there are subtle differences in the details and the presentation. Extensive changes to labels will be required if consistency is to be achieved. For example, some schemes have been modified so that they are able to differentiate within categories eg cheese and spreads, and/or to take into account the role of the food within the diet (eg main meal item vs a snack). The new requirements of the FIR will necessitate numerous packaging changes, even in relation to the font size used. The changes to front of pack information, which will affect all retailers' own brand food and beverage products will add to the cost and complexity of the process and also influence the deadlines by which decisions are required.

## NEXT STEPS

The consultation revealed that for some food categories, eg biscuits, cheese, butter and spreads, breakfast cereal, and yogurts (for at least some of the nutrients), the existing FSA thresholds fail to differentiate healthier options within the category. Does this matter? In the cheese category, for example, at least 80% of products carry 3 reds according to new research conducted

recently on behalf of the Department of Health (and the nutrients targeted do not take into account the positive nutritional attributes of cheese, particularly calcium). It is argued that this implies that the approach may be ineffective in nudging consumers to make a number of small steps in a healthier direction. This is important if purchase decisions are undertaken within categories rather than between categories, that is biscuits vs biscuits rather than biscuits vs fruit. Furthermore, it has been argued that the thresholds chosen and the degree of categorisation that is implemented (ie whether there are separate sets of thresholds for particular types of food as has been mooted for the nutrient profiling element of the Nutrition and Health Claims Regulation and has been adopted in schemes used elsewhere) influence the nature of the impact of the labelling scheme: whether it moves consumers towards healthier options within a category or whether it simply highlights levels of nutrients/ingredients of public health concern and requires a separate education programme to effect behaviour change. The choice of thresholds may also influence the extent to which the scheme drives reformulation in a positive direction, ie whether it's feasible to modify a product such that it moves from red to amber or amber to green for a particular nutrient. It is worth noting that the October announcement referred to some adjustments made to the FSA salt criteria in 2009 but never published. This recommended bringing the salt value that triggers 'red' down from 1.5g/100g to 1g/100g. Many products have been reformulated and now show amber using the published (1.5g) criteria. But if the new value of 1g is adopted, many

products are likely to revert to red, hence removing the degree of differentiation that currently exists that can be used to affect consumer choice.

A window of opportunity exists to explore the pros and cons of existing schemes and fine tune them. Using the threshold criteria developed by the Food Standards Agency, officials at the Department of Health have been meeting with interested parties and have commissioned modelling work on the impact of the FSA thresholds on the colour coding of foods and also on approaches to colour coding of energy (not currently included in the FSA scheme). In the run up to Christmas (21 December 2012), the Department of Health circulated a summary of the findings from the modelling work.

Time constraints, linked to the roll out of the FIR, are likely to dictate the scope for extra modelling work and for making changes to the existing FSA criteria that might provide consumers with a tool for decision making within categories as well as between categories of foods. It can still be argued that anything that encourages consumers to make use of the nutritional information provided on foods and as a result improve their food choices and eating habits is a step in the right direction.

## References

EFSA (2009) Scientific opinion of the Panel on Dietetic Products, Nutrition and Allergies on a request from the European Commission on the review of labelling reference values for selected elements. EFSA Journal 1008, 1-14.

- 1 <http://www.food.gov.uk/news/newsarchive/2006/mar/signpostnews/march>
- 2 [www.food.gov.uk/multimedia/pdfs/frontofpackguidance2.pdf](http://www.food.gov.uk/multimedia/pdfs/frontofpackguidance2.pdf)
- 3 <http://www.food.gov.uk/multimedia/pdfs/pmpreport.pdf>

