



Making all consumers matter



Making all consumers matter

20 Grosvenor Gardens
London SW1W 0DH

Telephone 020 7730 3469
Facsimile 020 7730 5851
www.ncc.org.uk

Scottish Consumer Council
Royal Exchange House
100 Queen Street
Glasgow
G1 3DN

Telephone: 0141 226 5261
Fax: 0141 221 0731
www.scotconsumer.org.uk

Shifra Sheikh
Food Standards Agency
Room 115c
Aviation House
125 Kingsway
London
WC2B 6NH

7 February 2006
Reference no. 012/06

Dear Shifra

Consultation on a voluntary front of pack Signpost labelling scheme for the UK

I am pleased to submit a joint response to the above consultation on behalf of the National Consumer Council (NCC) and the Scottish Consumer Council (SCC).

NCC and SCC warmly welcome the Food Standards Agency's (FSA) commitment to develop a front of pack labelling scheme. We recognise the importance this work has as one of a number of initiatives to help consumers make healthier choices more easily in support of the government's commitments to tackling obesity and diet related ill-health¹. We also recognise the value that front of pack signpost labelling will have to enable all consumers, and particularly those from disadvantaged backgrounds to make healthier choices easier.

There is wide support among consumers for a front of pack signposting scheme to encourage healthier eating. In addition to FSA's own research – NCC's recent research also shows support. MORI research for NCC² showed that consumers want foods to carry clear signpost labelling as a means to encourage them to eat more healthily, as well as wanting to see healthier school meals and food companies cut down the amounts of salt, sugar and fat contained in processed foods.

Both the NCC and SCC consider the key to the success of a front of pack signposting scheme will be the support given by and uptake from industry (both retailers and food manufacturers). We believe that FSA has a key role in encouraging this and we

¹ *Choosing Health - Making Healthier Choices Easier*. Department of Health. 2004

² MORI interviewed a nationally representative quota sample of 2,056 adults aged 15+ between 6th and 10th October 2005 in 197 sample points, using Computer Assisted Personal Interviewing (CAPI). Interviews were conducted face to face, in respondent's homes. All data have been weighted to the known profile of the population.

strongly support a consistent approach being adopted. Our research documented in *Rating Retailers*³ and *Healthy Competition*⁴ highlights the willingness of some companies to introduce front of pack signpost labelling – but we have been disappointed in the ‘go it alone’ approach. We believe this is confusing to consumers and undermines the robust approach taken by the FSA. We urge FSA to continue to work with companies and their trade bodies to ensure consistent uptake and roll out.

Below we make a number of general and more specific points on the consultation.

Multiple Traffic Lights:

NCC and SCC support the evidence that Multiple Traffic Lights (MTL) were found to be the preferred option for the majority of consumers. We note that it was the most easily understood format for those consumers from low-income and ethnic backgrounds. In light of this evidence, NCC and SCC fully support the FSA recommending the MTL format to be the most suitable for a voluntary front of pack labelling scheme. We call for a consistent approach to be taken by industry in its take-up.

Banding criteria:

The banding criteria for low, medium and high values of nutrients would seem appropriate. We also support the use of per portion criterion of 30% GDA intended for foods eaten in larger quantities than 100g.

Sugar

The consultation suggests that sugar criteria should be based on total sugars. NCC and SCC recognise that from a public health perspective the value for Non Milk Extrinsic sugars (NME's) would be the preferable basis on which to define the sugar criteria. We refer to COMA's⁵ report that NME sugars should not exceed more than 10 per cent of total energy intake. However, we are also aware of potential practical difficulties in using this measure. We strongly believe that to enhance uptake of signposting by companies its use and application must be practicable. For practical reasons therefore, we agree that sugar criteria should be based on total sugars as proposed in the consultation.

Guideline Daily Amounts (GDAs)

NCC and SCC strongly agree that in addition to front of pack signposting companies should also provide GDAs on the back of pack alongside the nutrition information panel. NCC's research into retailer's nutrition labelling practices^{3,4} over the last two years shows that retailers are already providing this information or are increasingly providing GDA information. Our recommendation is that the FSA should provide guidance on 'good practice' on nutrition labelling to include declaration of full nutrition labelling, provision of per 100g and per serving data, GDA declarations and front of pack signposting. This will support the introduction of consistent information

³ *Rating Retailers*. www.ncc.org.uk/food/rating_retailers.pdf.

⁴ *Healthy Competition*. How supermarkets can affect your chances of a healthy diet. S. Dibb. 2005. www.ncc.org.uk/food/healthycompetition

⁵ Department of Health (1991). Report on Health and Social Subjects 41. *Dietary Reference Values for Food Energy and Nutrients for the United Kingdom*. Report of the Panel on Dietary Reference Values of the Committee on Medical Aspects of Food Policy

for consumers across the industry that is recognised as important for consumer understanding, trust and use in such information.

Introduction of signposting

To support consistency of introduction we agree with the approach to introduce signposting initially to a limited range of food products. However we also recognise the limitations of this approach. Therefore we support a phased introduction – with clear targets and timeframes to roll out the scheme to include all pre-packaged foods within two years. We particularly wish to see snack products included from an early stage given the greater importance these items play in the diets of the overweight and obese⁶.

Consumer Information and awareness campaign

To support the introduction of signposting NCC and SCC consider it is essential that the FSA lead a public awareness campaign to educate and inform consumers on the purpose of the front of pack signposting and how it could enable them to make healthier choices when choosing pre-packaged food items. Such an awareness campaign, which retailers and food companies can support, is imperative to the success of front of pack signposting in changing behaviour of consumers in favour of healthier options.

Monitoring

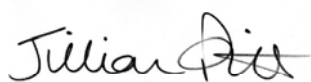
To measure and encourage use by companies, we recommend that FSA regularly monitor and publicly report on its uptake. NCC's experience is that using a competitive retail environment can support the introduction of health related practices that benefit consumers.

Implementation

We note that the FSA advocate a voluntary approach to the implementation of a front of pack signpost scheme. If a voluntary approach is not successful, i.e. if uptake is not wide ranging or consistent, then NCC and SCC support a mandatory approach.

Please do not hesitate to contact us if you require any clarification of the points raised in this consultation response.

Yours sincerely,



Jillian Pitt
National Consumer Council



Martyn Evans
Scottish Consumer Council

⁶ TNS, Family Food Panel (2003), for Ofcom.