World Consumer Rights Day 2015: Consumers Rights to Healthy Food

Briefing no. 4

Nutrition labelling on pre-packaged foods

About Consumers International

Established in 1960, CI is the world federation of consumer rights groups. Our goal is to ensure that consumer rights can never be ignored. With over 240 Member organisations spanning 120 countries, we serve as the only independent and authoritative global voice for consumer rights. We are a registered UK charity.

As part of a package of measures required to protect and promote healthy diets, CI is calling for mandatory, nationally-standardised nutrition labelling on all pre-packaged food and beverages in all countries. This should include the provision of interpretive, front-of-pack nutrition labelling that empowers consumers to make healthy food choices quickly and easily.

Why do consumers need nutrition labelling?

Consumers of pre-packaged food and beverages are dependent on nutrition labelling to guide healthy food choices.

An unhealthy diet is a major but preventable risk factor for chronic, non-communicable diseases (NCDs) such as cardiovascular disease, cancer, diabetes, and other conditions linked to obesity.[1] In 2010, over 11 million deaths globally resulted from an unhealthy diet; equivalent to 210 million years of life lost due to premature mortality.[2]

Globally, dietary patterns are changing as consumers prepare less food from raw ingredients and buy more processed, pre-packaged food. In the last decade global sales of pre-packaged foods have increased by 92 percent, reaching 2.2 trillion US dollars in 2012[3].

But the increase in the production, promotion and consumption of those processed foods that are unhealthy - energy dense, nutrient poor and high in fat, salt or sugar- has become a global driver of unhealthy diets in high, middle and low-income countries.[4] [5]

For consumers of pre-packaged foods who wish to make informed dietary choices - such as identifying which foods are HFSS, or choosing the healthiest option from a range of packaged foods - the nutrition information provided on food packaging is key. Consequently, CI is calling for nutrition labelling that helps consumers to quickly and easily interpret the nutritional value of packaged foods and prevent diet-related disease through healthy food choices.

CI recognises that nutrition labelling alone is not an adequate response to an issue of the scale of diet-related disease. This is why CI is campaigning for a Global Convention to protect and promote healthy diets[6], using a similar mechanism to the Framework Convention on Tobacco Control that includes other measures, besides better labelling, that help consumers to make healthier choices such as:

- Restrictions on food marketing to children
- Reformulation of processed food to reduce fat, sugar and salt and eliminate Trans fats
- Provision of better food in schools and public institutions
- Consideration of fiscal tools to promote healthier eating

[1] World Health Organization (n.d) *Diet* [online], WHO. Available at: http://www.who.int/topics/diet/en/ [Accessed 06.02.15]

[2] Institute for Health Metrics and Evaluation (n.d.) *GBD Arrow Diagram* [online], IHME. Available at: http://www.healthmetricsandevaluation.org/gbd/visualizations/gbd-arrow-diagram?type=Arrows&cr=risk&metric=4&colGrp=G&sex=3&age=22&yr=2010&rankRange=1,10&arrowDimen=-90 3 100,220,220,100,140 140 2 2 144 10,10,10,10,70 [Accessed 06.02.15]

[3] The Economist (2012) *Food For Thought* [online], Available at: http://www.economist.com/news/special-report/21568064-food-companies-play-ambivalent-part-fight-against-flab-food-thought

[4] R Moodie et al (2013) 'Profits and pandemics: prevention of harmful effects of tobacco, alcohol, and ultra-processed food and drink industries' *The Lancet*, 381 (9867), pp.670 - 679

[5] D Stuckler et al (2012) ' Manufacturing Epidemics: The Role of Global Producers in Increased Consumption of Unhealthy Commodities Including Processed Foods, Alcohol, and Tobacco', *PLoS Medicine* 9(6): e1001235.

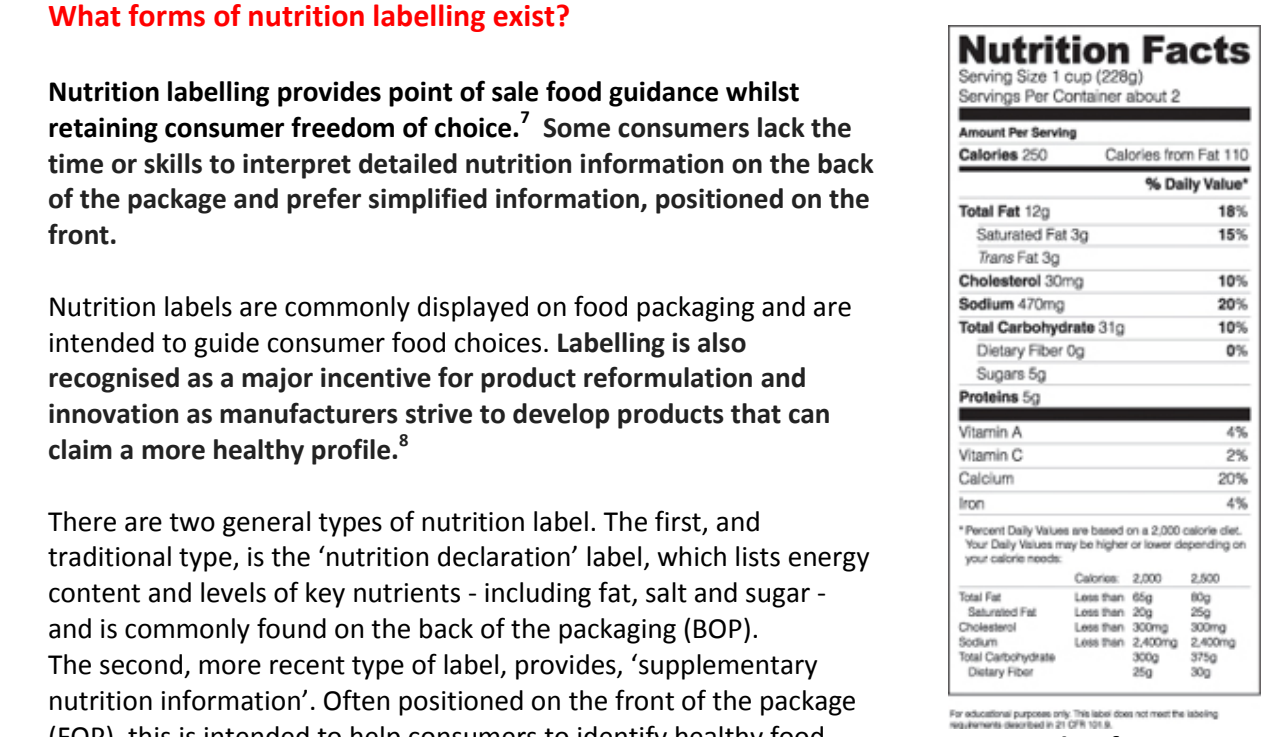
[6] Consumers International and World Obesity Federation (2014) *Recommendations Towards a Global Convention to Protect and Promote Healthy Diets* [online] Available at: http://tinyurl.com/nkqfurp

What forms of nutrition labelling exist?

Nutrition labelling provides point of sale food guidance whilst retaining consumer freedom of choice.[7] Some consumers lack the time or skills to interpret detailed nutrition information on the back of the package and prefer simplified information, positioned on the front.

Nutrition labels are commonly displayed on food packaging and are intended to guide consumer food choices. **Labelling is also recognised as a major incentive for product reformulation and innovation as manufacturers strive to develop products that can claim a more healthy profile.[8]**

There are two general types of nutrition label. The first, and traditional type, is the 'nutrition declaration' label, which lists energy content and levels of key nutrients - including fat, salt and sugar - and is commonly found on the back of the packaging (BOP).
The second, more recent type of label, provides, 'supplementary nutrition information'. Often positioned on the front of the package (FOP), this is intended to help consumers to identify healthy food choices 'at a glance' without having to read the full nutrient declaration on the BOP, perform calculations or understand percentages. An example of an interpretive label format used in the UK is the 'traffic light' system. This uses colours to indicate the extent to which a product should form part of a healthy diet.


Nutrition Facts
Serving Size 1 cup (228g)
Servings Per Container about 2

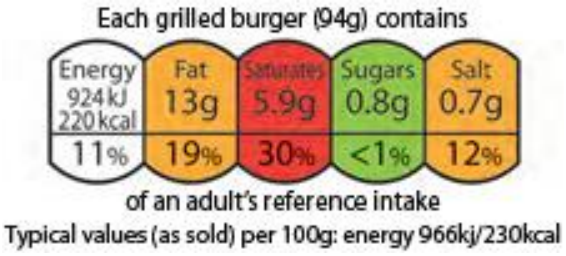
Amount Per Serving	
Calories 250	Calories from Fat 110
	% Daily Value*
Total Fat 12g	**18%**
Saturated Fat 3g	**15%**
Trans Fat 3g	
Cholesterol 30mg	**10%**
Sodium 470mg	**20%**
Total Carbohydrate 31g	**10%**
Dietary Fiber 0g	**0%**
Sugars 5g	
Proteins 5g	
Vitamin A	4%
Vitamin C	2%
Calcium	20%
Iron	4%

* Percent Daily Values are based on a 2,000 calorie diet. Your Daily Values may be higher or lower depending on your calorie needs:

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Saturated Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

For educational purposes only. This label does not meet the labeling requirements described in 21 CFR 101.9.

Example of nutrient declaration



FOP label example

What works best for consumers?

Studies suggest that many consumers do not have the time to process detailed nutrition information, or have difficulty doing so.[9] Consumers prefer simplified information on the front of the package that supplements the more detailed nutrient declaration on the back. Graphic FOP labels, such as those displaying traffic light colours or graphic elements, are more easily processed than labels primarily displaying detailed numeric information. [10] A three-year, EU-funded study concluded that the most promising option to increase consumers' use of nutrition labels was to provide information on key nutrients and energy on the front of the pack. [7] Some schemes highlight which products constitute healthy choices. This does not help consumers who want to avoid those nutrients associated with NCDs, namely sugar, salt, saturated fat, fat and energy content.

Consistency is essential. Several, high-profile nutrition labelling reports have concluded that standardised guidelines on the use of nutrition labelling would provide consistency and familiarity and improve consumer use of nutrition labels. [7 8 12]

Schemes should be accompanied with consumer education. An extensive food labelling report by the US Institute of Medicine concluded that "an FOP system can only reach its full potential [...] if it is accompanied by

[7] Grunert, K. & Wills, J. (2007) A review of European research on consumer response to nutrition information on food labels, *Journal of Public Health*, 15 pp.385-99
[8] Food Labelling to Advance Better Education for Life (Flabel), (2012) *Results flyer* [online] Available at: http://flabel.org/en/upload/EUFIC_FLABEL_ResultsFlyer.pdf
[9] Institute of Medicine (2012) *Front-of-Package Nutrition Rating Systems and Symbols - Promoting Healthier Choices* [online] Available at: http://www.nap.edu/openbook.php?record_id=13221
[10] US Dept of Health and Human Sciences (2011) *Policy Research for Front of Package Nutrition Labeling: Environmental Scan and Literature Review* [online] Available at: http://aspe.hhs.gov/sp/reports/2011/fopnutritionlabelinglitrev/index.shtml

an education and communication campaign to keep its relevance fresh in the minds of consumers' [8]. In particular, campaigns must target those consumers at high risk of diet-related disease and any groups identified as being less likely to use nutrition labels. [11]

What is CI is calling for?

CI is campaigning for a Global Convention to protect and promote healthy diets[12], using a similar mechanism to the Framework Convention on Tobacco Control. A Global Convention would commit governments to a package of policy measures designed to help consumers eat more healthily. This would include: restrictions on food marketing to children; nutrition labelling; provision of better food in schools and public institutions and consideration of fiscal tools to promote healthier eating. A Global Convention should also include measures to improve nutrition labelling:

All countries to take measures to ensure that consumers have clear information about the nutritional quality of a food or beverage product at the point of choice

All pre-packaged products should include a nutrition declaration as well as supplementary nutrition information.
The nutrition declaration should be provided per 100g as well as per portion and include: energy value; protein, carbohydrate, fat, saturated fat, sodium and sugar, as well any other nutrient considered relevant for maintaining a good nutritional status.

The supplementary nutrition information must appear on the front of the pack and include the priority nutrients for public health (energy, fat, saturated fat, sugar and salt) in the following form:

- A statement of the amount of the nutrient present and an interpretive indication of whether the amount is high, medium or low in relation to national dietary guidelines, for example by using colour coding or a similar scheme.
- The expression of the amount per recommended portion as a percentage of the reference intake that is recommended.

Examples of countries with FOP nutrition labelling policies

UK
In 2013, the Government published revised national guidance for a voluntary Front of Pack Nutrition Labelling Scheme for pre-packaged products. The guidelines are for colour coded labels which use green, amber and red to identify whether products contain low, medium or high levels of energy, fat, saturated fat, salt and sugar.

All major UK retailers and a number of multinationals have voluntarily started using the traffic light labelling scheme including Mars, Coca-Cola, Pepsico, Nestlé, McCain and Kraft Foods.

Australia
In 2013, the Australian government approved a 'Health Star Rating' (HSR) system as a voluntary scheme for industry adoption. The system takes into account four aspects of a food associated with increasing risk for chronic diseases; energy, saturated fat, sodium and total sugars content along with certain 'positive' aspects of a food such as fruit and vegetable content, and in some instances, dietary fibre and protein content. Star

[11] J Hersey et al (2013) Effects of front-of-package and shelf nutrition labeling systems on consumers, *Nutrition Reviews*, 71: p1–14.
[12] Consumers International and World Obesity Federation, (2014) *Recommendations Towards a Global Convention to Protect and Promote Healthy Diets* [online]. Available at: http://tinyurl.com/nkqfurp

ratings range from ½ star (least healthy) to 5 stars (most healthy). The implementation of the HSR system will be overseen in 2014 by the Health Star Advisory Committee.

Chile
A law will come into force later this year in Chile which stipulates the mandatory use of warning labels on food products containing what are considered to be 'excess' levels of salt, sugar or saturated fat. The use of this kind of warning label is unprecedented. Promotion and advertising of the products carrying these warning symbols to children under 14 will be restricted.

Ecuador
Ecuador uses a mandatory 'traffic light' system on the front of food packaging to indicate high (red, medium (orange) or low (green) levels of fats, sugars and salt. This legislation was put in place by the Ministry of Health, and was implemented in 2014.

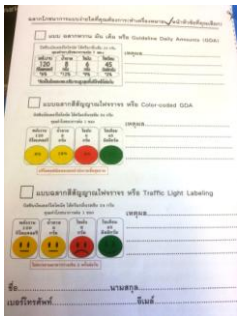
Finland
National legislation regarding the compulsory use of warning labels on high-salt foods has been in place in Finland since 1993. The legislation applies to all the food categories that make a substantial contribution to the salt intake of the Finnish population.

Ideas for actions

Run your own FOP labelling survey

In March 2013, Consumers International (CI) initiated a food labelling quiz designed to illustrate the difficulty that consumers currently face in choosing a healthy diet. Consumers were shown pictures of processed food products without FOP labelling and asked to guess which were high, medium or low in sugar, salt, fat and energy. They were then shown the same products again with FOP labelling and asked to guess again.
Ten CI Member organisations took part and more than 3,300 consumers across 11 countries completed the quiz. CI and its Members used the results from the quiz to lobby at national and international level for front-of-pack (FOP) nutrition labelling and other actions that facilitate healthy dietary choices. Most members did the quiz online but one did a street survey. You could organise a live survey using the products themselves.

Visit the CI Resource Zone to download a 'how to' guide that will help you to replicate the quiz. Available in English, Spanish and French
http://www.consumersinternational.org/news-and-media/resource-zone/how-to-create-an-online-food-labelling-quiz-as-a-lobbying-tool/



Alternatively you could survey consumers to ask them which type of labelling they prefer. This was done in Thailand in 2014 by Foundation for Consumers, Thailand.

Further reading (English language)

All of the policy examples used in this briefing are taken from the World Cancer Research Fund International online Nourishing Framework. See these and more: http://www.wcrf.org/int/policy/nourishing-framework/nutrition-labels

European Food Information Council Global Update on Nutrition Labelling Executive Summary available for free http://www.eufic.org/upl/1/default/doc/GlobalUpdateExecSumJan2015.pdf

Choice, Australia on FOP campaigns
http://www.choice.com.au/consumer-action/food-labelling/nutrition-labelling.aspx

UK Government Guide to creating a front of pack (FoP) nutrition label for pre-packed products sold through retail outlets
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300886/2902158_FoP_Nutrition_2014.pdf

A short briefing from a coalition of UK organisations including CI member Which? on why consumers need traffic light labelling: http://www.actiononsalt.org.uk/news/Salt%20in%20the%20news/2012/76872.pdf