

NUTRITION LABELLING HELPING CONSUMERS MAKING HEALTHIER CHOICES

Contact: Ruth Veale – food@beuc.eu
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BEUC, the European Consumers' Organisation
36 avenue de Tervueren, 1040 Bruxelles - +32 2 743 15 90
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Summary

In January 2008 the European Commission put forward a proposal for a regulation on food information to consumers¹. This regulation revises and brings together the previous nutrition labelling and food labelling directives, and includes new requirements. This paper focuses on front of pack simplified labelling and back of pack nutrition labelling.

With the rising incidence of obesity and diet-related diseases across Europe, this review of food information provides an opportunity to ensure that nutrition labelling is efficient and guides consumers to make informed and, ultimately, healthier food choices.

BEUC and our members, which represent consumers in 30 European countries, welcome the fact that the proposal *"makes nutrition labelling mandatory"*. However, the proposal falls far short of our demands for:

**a mandatory multiple colour coding labelling scheme
indicating the level of key nutrients on the front of pack
and
a mandatory nutrition information panel including at least the 'big eight'
nutrients of public health significance on the back of pack**

¹ Proposal for a Regulation of the European Parliament and of the Council on the provision of food information to consumers – COM (2008) 40.

Despite the increasing focus on the need to tackle diet-related diseases across Europe, it is still difficult for consumers to know what they are eating from the information provided on food labels.

A BEUC study in 2005², found that most consumers were interested in nutrition labelling (e.g. 87% in Poland, 83% in Spain,...).

In various member states, there is still no nutrition labelling provided on many food products. Directive 90/496/EEC on Nutrition Labelling for Foodstuffs lays down that nutritional labelling has only to be provided on a voluntary basis. The new proposed regulation on food information to consumers would make a nutrition declaration mandatory for foods. The declaration must include the energy value and the amounts of fat, saturates, salt and carbohydrates with specific reference to sugars. However, the form of expression, namely as a percentage of a set reference intake, is not sufficient. In addition, the proposal does not go far enough in that other nutrients such as trans fats, fibre and protein, which are important to health, have been omitted from mandatory labelling.

Front of pack: the need for simplified multiple colour coding

A number of manufacturers and retailers already provide some information about nutrients on the front of pack, but rather than helping consumers, the proliferation of different types of so-called simplified labelling schemes instead adds to consumer confusion.

The BEUC study on consumers perception of foodstuffs labelling³ showed that a majority of those consumers interviewed want a simplified system to indicate the nutritional quality of a food product on the packaging.

As a follow on to this, in 2006 BEUC chaired a discussion group⁴ which carried out a systematic review of front of pack labelling research from across the EU. The recommendations of this group, plus the subsequent research conducted by our members⁵ (for example Which? (UK) and Consumentenbond (The Netherlands)) clearly highlights that the front of pack labelling scheme which works best for consumers is a multiple colour coding labelling scheme that uses red, amber (orange) and green colours to interpret the levels of key nutrients. The indication of the percentages of the reference intakes can be provided in addition.

² Report on European Consumers' Perception of Foodstuffs Labelling, Results of Consumer Research conducted on behalf of BEUC from February to April 2005 in five countries (Poland, Spain, Hungary, Denmark and Germany), BEUC 2005.

³ See footnote 2.

⁴ Discussion group on Simplified Labelling: Final Report, Simpler Labelling for Healthier Choices, BEUC July 2006.

⁵ Research by Which? (UK), Consumentenbond (Netherlands).

A multiple colour coding scheme:

- provides at a glance information of some of the key nutrients;
- interprets what the levels of key nutrients mean (high, medium or low);
- is easy for all consumers to understand;
- provides understandable information on the relative amounts of key nutrients in the product.

An EU-wide multiple colour coding scheme should be based on the use of red, amber and green colour coding to indicate whether levels of the key nutrients (fat, saturated fat, sugar and salt) are high, medium or low. The colour categorisation should be based on sound, independent science-derived criteria, founded on advice from the European Food Safety Authority (EFSA). The use of the scheme should be prioritised on processed foods because it is more difficult to know the amounts of fat, sugar and salt present in the final product. Finally, an across the board approach that enables comparisons between different products (i.e. per 100g or per 100ml) is essential.

Front of pack: The Commission's approach

The Commission proposes a system based on percentages of reference intakes, also known as GDAs⁶ as the mandatory format for simplified labelling.

We would only support the use of the reference intakes scheme if it is added to a multiple colour coding scheme. Information based on reference intakes indeed does not take account of the evidence for what works best for consumers. It does not sufficiently reflect the need to reduce our intakes of some nutrients. Research by the Dutch consumer organisation, Consumentenbond⁷, for example, has found that many consumers see GDAs as a target to aim for, and not as the maximum amount that is acceptable in a public health perspective. Other research by Consumentenbond and Which? has shown that consumers find it more difficult to use a %GDA scheme than a scheme using multiple colour coding. It is also unrealistic to believe that consumers will start to add up their %GDAs consumed during the day. GDAs alone might be misleading as reference intakes vary between individuals⁸. They do not give an easy nutritional assessment such as colour coding, thus are not as quick for consumers to use and interpret.

In our view where the %GDA scheme is already in use, the multiple colour coding scheme should be added in it in order to enable consumers to more easily make use of the information.

⁶ GDAs can be considered identical to reference intakes.

⁷ 'Logoland – simplified nutritional labelling in the Netherlands'. Consumentenbond; September 2007

⁸The Nordic Nutrition Recommendation, for example, recommends maximum 55g/day for women. For children, the upper daily intakes of sugar are max. 30g for children 2-5 years, max 45 for children 6-9 years, max 55g for children 10-13 years, and max 65g for children 14-17 years.

Back of pack: 'big eight' plus trans fatty acids

The Commission proposal states that the mandatory nutrition declaration must be in the principle field of vision. However it does not mention anything about back of pack nutrition labelling. Some consumers just want simple front of pack information, but others, for example those on special diets, need more detailed information. The back of pack is important as it allows consumers to compare more detailed aspects of the nutrition information and make effective comparisons between different products. The Commission proposal fails to respond to an essential demand for consumers.

In order for a nutrient label to be meaningful to consumers, the 'big 8' (energy, and the nutrients protein, energy, fat, saturated fat, carbohydrate, sugar, salt and fibre) plus trans fatty acids must be included on the back of the pack labelling. This level of information is required to be able to make informed and healthy food choices and to implement healthy eating advice. It is very disappointing that the Commission proposal does not require mandatory labelling of all the nutrition information. Considering the increasing interest of consumers to follow a healthy diet and/or lose weight, clear, complete nutrition information is paramount.

When questioned in the 2005 BEUC study, consumers said that they were largely in favour of detailed labelling:

- 68% of those who participated in the study declared to be interested in saturated fats labelling;
- 77% stated they want proteins to appear on the label;
- 72 and 73% were interested respectively in fibre and sodium/salt labelling;
- Energy value should be mentioned on the label according to 79% of interviewees;
- Sugar labelling is requested by 86% of interviewed consumers and fat by 88%.

Why the 'big 8' should be labelled on the back of the pack:

Big 8	
energy	Is essential to be able to keep account of the energy content of foods. Current diets are characterised by too high an energy intake. Information on the energy content helps consumers to choose foodstuffs that contain less energy and consequently to control their dietary energy intake.
protein	Consists of amino-acids which are essential for growth, tissue repair and replacement. Proteins deliver energy (with fats and carbohydrates).
carbohydrates	Are a major component of many basic foodstuffs, which deliver a substantial part of the intake of energy and essential nutrients. In addition, the exact quantity of carbohydrates is indispensable for diabetics.

sugars	Are predominantly present in foodstuffs that do not make an important contribution to the intake of essential nutrients. Due to their rapid digestion they give little satiety. Therefore, they are major contributors to too high energy intakes and weight gain. Besides this, sugars may cause tooth decay
fat	Its presence contributes to a high energy density of foodstuffs which is a main cause of a high energy intake and thus weight gain. Moreover, many fats may contain unhealthy fractions such as saturates and trans fatty acids, the intake of which should be limited.
saturates	Raise the total blood cholesterol level. In particular, they raise the level of the 'bad' cholesterol. According to a WHO/FAO Expert Consultation ⁹ saturates should not provide more than 10% of food energy. In the EU this percentage is on average higher.
fibre	Provides bulk to the diet, decreases the energy density of foodstuffs and gives a feeling of satiety. Fibres are resistant to digestion and absorption and improve gut health. Moreover, dietary fibres are especially present in basic foodstuffs that are major contributors to the intake of essential nutrients. In addition, the intake of fibre reduces the risk of developing various illnesses.
salt	Excess salt intake is linked with high blood pressure and heart disease. Salt intake should not exceed 6 g/day. The current intake of most EU citizens is much higher.
trans fatty acids	The intake of trans fatty acids increases the risk of cardiovascular disease. They raise the 'bad' cholesterol and lower the level of 'good' cholesterol. They also fire inflammation, could imply an over-activity of the immune system and are implicated in heart disease, stroke, diabetes and other chronic conditions.

⁹ Joint WHO/FAO Expert Consultation on Diet, Nutrition and the Prevention of Chronic Diseases, 2003.

Conclusion

The review of the nutrition labelling directive provides a long over-due opportunity to improve the way nutrition information is provided to consumers. The escalating rates of obesity and diet-related disease across Europe mean that we cannot afford to take half-hearted measures.

It is essential that comprehensive nutrition information on food products is presented in a way that is clear and easy to understand for all consumers. The chosen approach must be based on independent evidence. Full mandatory nutrition information on the back of the pack must be accompanied by a simplified multiple colour coding labelling scheme, interpreting the level of key nutrients on the front of pack.

A multiple colour coding scheme is a real effective labelling tool to help consumers to make informed and ultimately, healthier food choices.

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