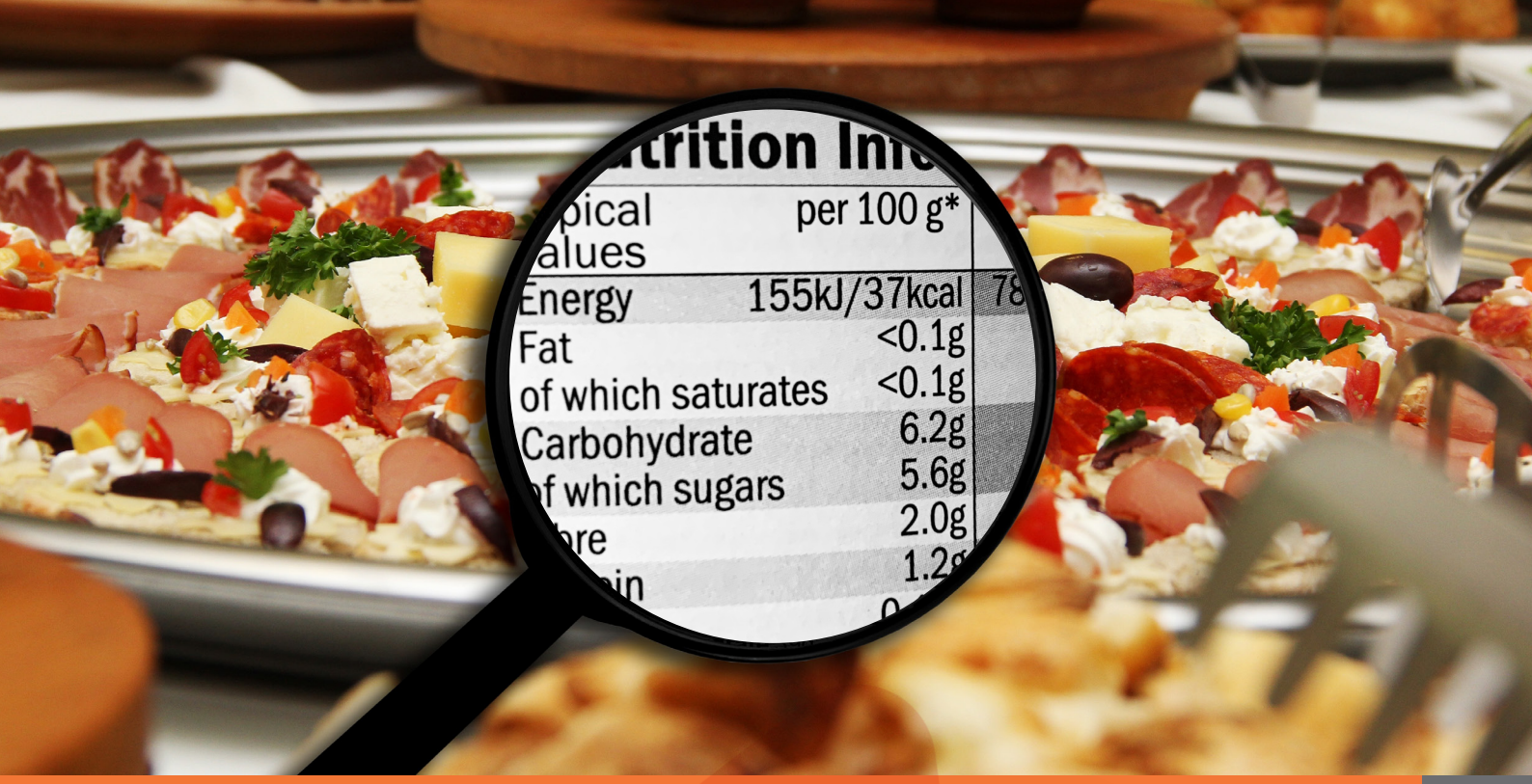


BRIEFING

November 2019

OBESITY AND LABELLING

Key Points

- Labelling provides vital information and factual data helping consumers make informed choices
- Labelling of pre-packed food is regulated at European level
- Back of pack nutrition labelling is required on all pre-packed food and drink with the exception of alcoholic beverages
- Front of pack (FoP) 'traffic-light' labelling is voluntary in the UK
- Evidence consistently confirms that the 'traffic light' hybrid label is effective
- Consumers agree that FoP labelling helps them make healthier choices
- Evidence consistently suggests that labelling also increases pressure on manufacturers to reduce the amount of harmful salt, sugar and animal fat concealed within
- Mandatory calorie labelling in the out-of home sector is being considered in Scotland and England. However, there are currently no requirements to label foods sold in the out of home sector (not pre-packed)

Key Recommended Actions

FOR RETAIL

- Make front of pack traffic-light-labelling mandatory
- Make calorie information on alcoholic drinks mandatory

FOR OUT OF HOME

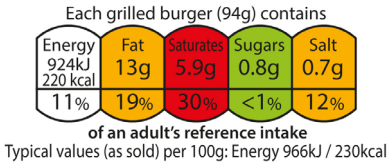
- Make calorie labelling at point of sale out of home mandatory
- Standardise nutritional information across the out of home sector

Obesity Action Scotland
Healthy weight for all

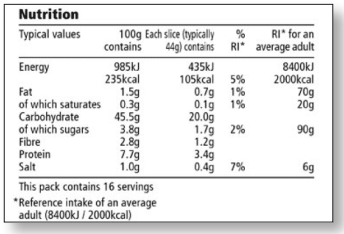
TYPES OF LABELLING

On Individual Food and Drink

Front of Pack



Back of Pack



Nutrition

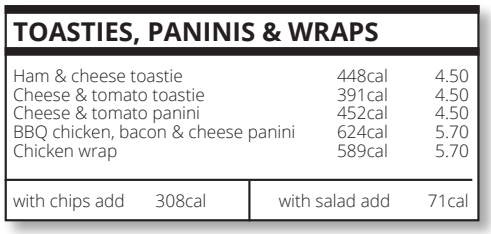
Typical values	100g contains	Each slice (typically 44g) contains	% RI*	RI* for an average adult
Energy	985kJ 235kcal	435kJ 105kcal	5%	8400kJ 2000kcal
Fat	1.5g	0.7g	1%	70g
of which saturates	0.3g	0.1g	1%	20g
Carbohydrate	45.5g	20.0g		
of which sugars	3.8g	1.7g	2%	90g
Fibre	2.8g	1.2g		
Protein	7.7g	3.4g		
Salt	1.0g	0.4g	7%	6g

This pack contains 16 servings

*Reference intake of an average adult (8400kJ / 2000kcal)

On Menus

Calorie Information



TOASTIES, PANINIS & WRAPS

Ham & cheese toastie	448cal	4.50
Cheese & tomato toastie	391cal	4.50
Cheese & tomato panini	452cal	4.50
BBQ chicken, bacon & cheese panini	624cal	5.70
Chicken wrap	589cal	5.70

with chips add	308cal	with salad add	71cal

DEFINITIONS

Front of pack (FoP) labelling refers to 'at a glance' information on the front of a package of food and drink. It offers information on the energy, fat, saturated fat, sugar and salt per portion of the product and percentage of reference intakes (RI). It is voluntary in the UK and around three quarters of packaged food and drink has it.

Back of Pack nutritional information is mandatory in the EU and regulated at the EU level. While the nutrients that need to be reported are specified, he design of the back of pack label is not. On many products this information is printed in very small font.

Calorie labelling on the menus out of home is voluntary in the UK and therefore employed only by a fraction of out of home businesses. When provided, it varies considerably. It is currently being considered to be made mandatory in Scotland and England.

Other labelling may also be placed on pre-packaged food and drink. It includes information about ingredients, the use-by' or 'best-before' date, presence of allergens, and may include specific health or nutrition claims, storage and cooking instructions or provenance of food.

Reference Intake (RI) indicates how much energy the average person needs and how a particular nutrient fits into their daily diet. For example, the RI for total sugars is 90g/day.

Total sugars are all sugars (monosaccharides and disaccharides) in food excluding polyols (sugar-free sweeteners).

'Added sugars' or 'free sugars' are sugars added to food by the manufacturer or consumer, and sugars in honey, syrups and unsweetened fruit juices and fruit juice concentrates.[1,2] Sugar contained in milk and whole fruits and vegetables is excluded from the 'free sugar' definition.

EUROPEAN REGULATIONS APPLIED IN THE UK

Regulation (EU) No 1169/2011 on the Provision of Food Information to consumers was implemented in December 2014. This regulation sets out information that should be provided to allow consumers to make informed choices.[3]

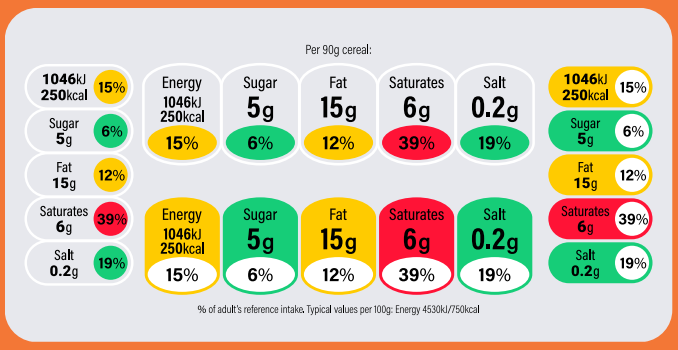
Some of the specifics include

- Full mandatory Back of Pack labelling is required and must include energy, fat, saturates, carbohydrate, sugars, protein and salt. It must be expressed per 100g or 100ml but can also be expressed per portion and/or consumption unit. It should also include adult reference intake (RI) values for energy, selected nutrients, vitamins and minerals
- Allergens must be clearly highlighted in the ingredients list in bold, italics or colour
- Other nutrients can be reported only if they are included on the list of voluntary nutrients; these are monounsaturated fatty acids, polyunsaturated fatty acids, polyols, starch, fibre, vitamins or minerals; the list does not include added or free sugars
- Ingredients need to be specified on back of pack, listed in decreasing weight

In July 2007 regulation (EC) No 1924/2006 established European rules on nutrition and health claims. This regulation is for food manufacturers who wish to highlight a benefit of a product on the label or in advertising. Nutrition claims such as 'low fat' and 'high fibre' are classed as nutrition claims and health claims include statements such as 'Vitamin C contributes to the normal function of the immune system". Both nutrition and health claims need to be backed up by substantial scientific evidence and authorised by the EU Commission.[4]

FRONT OF PACK 'TRAFFIC-LIGHT' LABELS IN THE UK

FoP 'traffic-light' labelling, is voluntary in the UK. However, if available, it must be in addition to full mandatory back of pack labelling and meet a set of requirements in line with the EU regulations.[5] If used, FoP labelling must show energy, fat, saturated fat, sugar and salt in either 100g/ml or a product portion. It is estimated by Public Health England that 75% of products currently carry voluntary traffic light front of pack labelling.[6]



In Scotland, a review of the Obesity Route Map in 2015 recognised industry for its contribution to introducing consistent FoP labelling. However, work with industry has made slow progress.[7]

Research shows that the traffic-light system is more effective than other labels to help make healthier purchasing decisions. For example, perceived healthiness of foods has been shown to be influenced by traffic-light labels more than Guideline Daily Amount or a simple 'healthy choice' tick.[8]

Health campaigners have long been calling for all food and drink manufacturers to adopt FoP 'traffic-light' labelling. TV Chef and health campaigner Hugh Fearnley-Whittingstall famously staged a protest outside Kellogg's head office. Kellogg's have since adopted the scheme, although they claim it was already in the pipeline.[9]

CALORIE LABELLING ON THE MENUS IN THE UK

Currently in the UK there is no requirement to place any nutritional information on food sold out of home that is not pre-packed. Voluntary calorie labelling out of home was a part of the Responsibility Deal and was in place since 2011, yet the majority of businesses out of home still do not provide this information. Consequently, customers cannot base their choices on calorie content, even if they wish to make a healthy choice. Both the Scottish and UK Governments are considering introduction of mandatory calorie labelling out of home (for more information see Policy Position section below).

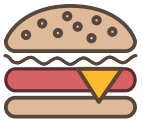
Evidence shows that calorie labelling on menus can help to reduce the number of calories people consume.[10] It is also evident that calorie labelling drives businesses to reformulate products to reduce calories.[11] Only mandatory calorie labelling would create a level playing field and guarantee that all customers of all out-of-home food businesses have equal access to the information needed to make an informed choice.

OTHER LABELLING

Apart from the FoP and back of pack labelling, food and drink packaging includes other information such as use by date or best before date, ingredients, allergy warnings, or whether product is organic, free-range and where it comes from. Some of this information is mandatory.

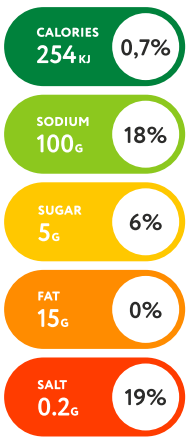
Health campaigners have been suggesting new types of food and drink labelling to help consumers in making healthier choices. For example, Jamie Oliver's sugar teaspoon symbol accompanied by a number to indicate how many teaspoons of sugar there are in soft drinks or The Royal Society for Public Health's proposal to present calories in a product as minutes of exercises needed to burn these calories. There is no indication that any of these will be required in the near future.

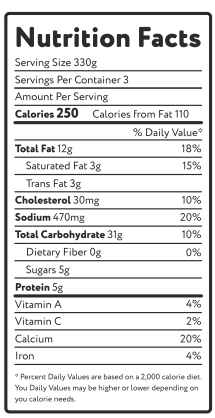
670 CALORIES



550 CALORIES

350 CALORIES





Nutrition Facts

Serving Size 330g	
Servings Per Container 3	
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	
Protein 5g	
Vitamin A	4%
Vitamin C	2%
Calcium	20%
Iron	4%

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

CONSUMER ATTITUDES SUPPORT FOOD LABELLING

Consumers in Scotland and the UK support improved and more consistent labelling on packaged foods and foods out of home:

- The majority of respondents (68%) to the recent FSS consultation on improvements to out of home sector in Scotland, were in favour of mandatory calorie labelling at the point of choice
- An earlier survey of 1440 young adults in Scotland found that nearly half (46%) would welcome calorie information in catering settings and on alcoholic drinks[12]
- In FSS's consumer tracking survey (wave 6) 74% of respondents said that it was important to look at traffic light labelling and only have foods that are high in fat, salt or sugars occasionally and in small amounts[13]
- Research commissioned by the Department of Health and Social Care found that around 80% of people look at the label when shopping and those that do tend to have healthier shopping baskets (fewer calories, less sugar, fat, salt and higher fibre)[14]
- A Diabetes UK survey of over 2000 adults in the UK, found that nine out of ten people said that traffic-light food labelling helped them make healthier choices[15]
- In a survey commissioned by the Chartered Institute of Marketing at the beginning of 2014, 76% of 2,012 UK adults said they understood the traffic-light system, however the majority answered four out of the five questions on the labelling system incorrectly[16]
- Following the BBC television show 'Britain's Fat Fight with Hugh Fearnley-Whittingstall' 97,869 people signed a letter to the UK Government with questions about the obesity crisis, including asking if the Government would commit to making front-of-pack traffic light labelling compulsory.[17]

LABELLING AND INEQUALITIES

Concerns that **FoP 'traffic-light' labelling** could potentially widen inequalities, by having a larger beneficial effect on those who already have healthy preferences,[7] are countered by evidence that **FoP 'traffic-light' labelling** is more easily understood by those at all levels of literacy.[18] To increase the effectiveness of food labelling in disadvantaged populations it has been recommended to run mass media campaigns and education initiatives, offer price incentives and define quality standards.[19] Public awareness campaigns such as **Food Standards Scotland's #Lookatthelabel** or **Change4Life's** public information TV fillers have tried to address this issue.

While Public Health England created an easy to use **Food Smart app** which helps consumers to find out how much sugar, salt and fat is in food and drink products by scanning their bar codes,[20] it is only of use to those with smart phones.

LABELLING AND BREXIT

The UK's exit from the EU is seen as an opportunity for potential changes to the **FoP labelling scheme** and the introduction of mandatory enforcement.[21] Guidance has already been issued to businesses regarding changes to labelling that will come in to force if the UK leaves the EU without a deal.[22] After Brexit, the UK will have a 21-month transition period to make any labelling changes for goods sold in the UK. These proposals are still to be agreed with the UK's devolved administrations and Parliamentary process.

To date, alcoholic drinks are not included under the EU-wide food labelling rules. A voluntary energy declaration (per 100ml) can be made on alcoholic drinks without the need to provide a full list of nutrients **('Back of Pack')**, which would otherwise be mandatory on pre-packed food. The Royal Society for Public Health (RSPH) see Britain's departure from the EU as an opportunity for a new approach to the way alcoholic drinks are labelled in the UK. They wish to see mandatory inclusion on pack of the Government's low-risk drinking guidelines, a drink drive warning on the label and calorie content per container or serve on the front label.[23]

INTERNATIONAL POLICY

There are a number of **FoP** and **BoP** labelling schemes around the world. In Europe there are a few **FoP** voluntary schemes that aim to help consumers make healthier choices.

Choices labelling in the Netherlands, **Keyhole** in the Nordic countries, Finnish **Heart symbol**, Croatian **Healthy Living mark** or **Nutriscore** in France. The schemes differ, for example positive labels such as Keyhole apply different criteria for different food categories, while Nutriscore uses similar criteria for all categories.[24] However, all of the European schemes use 100g or 100ml as reference unit, use thresholds to qualify products, and use disqualifying components in the product criteria.[24]

In 2016 the Food and Drug Administration in the United States announced changes to the back of pack

mandatory nutrition label to include, among other improvements, 'added sugars' as well as total sugars. Manufacturers have until 2021 to comply with the new rules.[25] Calorie information must be listed on menus and menu boards in chain restaurants with over 20 establishments. These rules were finalised by the Food and Drug Administration (FDA) in May 2018.[26]

Similarly to the USA, Canada has also updated their mandatory labelling on pre-packaged foods to improve serving size understanding and comparisons, make calorie information more visible and update the list of minerals of public health concern.[27]

(US ORIGINAL LABELLING)

(US NEW LABELLING)

POLICY POSITION

Scottish Government in **A Healthier Future: Scotland's Diet and Healthy Weight Delivery Plan** published in July 2018 declared that it would urge the UK Government to introduce mandatory FoP 'traffic-light' labelling.[28] The plan also announced consumer research on a possible consumer education marketing campaign on nutrition labelling and engagement with health and education networks to support relevant professionals to encourage consumers to use nutrition labels to make healthier choices. Earlier, in 2017 the Scottish Government promised to explore how current labelling could be improved, including how it was communicated to the public, and consider the use of other labelling approaches.[29]

Food Standards Scotland's proposals to improve the out of home environment were put out for consultation in late 2018. Analysis of the responses to this consultation showed strong support for the introduction of the calorie labelling on the menus out of home.[30] At the same time FSS published a set of recommendations to the Scottish Ministers, stressing that mandatory calorie labelling at point of choice was an essential first step in the provision of information for consumers eating out of home and strongly suggesting this was a part of the Scotland's out of home strategy.[31] If Ministers decide to pursue this, FSS will prepare a further paper with details of implementation in 2020.

UK Government consulted on making calorie labelling mandatory in the out-of-home sector in 2018. The responses are not yet published and the UK Government committed to set out details of this policy in a consultation response.[32] Their green paper, which included Chapter 3 of the Childhood Obesity Plan for Action, also committed to consulting by the end of 2019 on how the successes of the current front-of-pack nutritional labelling scheme can be built on once the UK have left the European Union.[32]

In 2018 in Chapter 2, the UK Government promised to introduce legislation to mandate consistent calorie labelling in the out-of-home sector after a consultation period, and explore opportunities for food labelling after the UK leaves the EU.[21] In 2016 in Chapter 1, the UK Government promised to review, among other issues, the use of clear visual labelling on packaging such as teaspoons of sugar.[33]

Over 30 business leaders wrote a letter to Environment Secretary Michael Gove encouraging Government to pause consultations on all food, farming and environment issues because of the uncertainty of Brexit.[34]

The Health and Social Care Select Committee (HSC) recommended that the UK Government makes FoP 'traffic-light' labelling mandatory in retail and in the out-of-home sector to create a level playing field for industry and consumers.[35] In line with evidence from Public Health England they would support a ban on health claims on food and drink high in fat, salt and sugar.[35]

World Cancer Research Fund advised that governments consider mandatory implementation of FoP labelling to deliver consistency and overcome the reluctance by food manufacturers to implement the voluntary scheme.[18] WCRF stated that by helping consumers choose, FoP contributes to creation of healthier food environments.[18]

World Health Organization (WHO) recommended FoP labelling as one lever to reduce obesity and diet-related non-communicable diseases.[36]

A number of organisations (Obesity Action Scotland, Alcohol Focus Scotland, The Royal Society for Public Health, the Royal College of Physicians of Ireland and Local Government Association and others) are all of the view that alcohol labelling should contain information on calories.

obesityactionscotland.org

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