

## **SPECTRUM response to DHSC consultation: Front-of-pack nutrition labelling in the UK: building on success**

This document outlines the responses submitted to the above UK Government consultation and the following points should be noted:

- SPECTRUM is a multi-university, multi-agency research consortium focused on the commercial determinants of health and health inequalities funded by the UK Prevention Research Partnership. Our primary focus is the generation of evidence to inform the prevention of non-communicable diseases caused by unhealthy commodities such as tobacco, alcohol and unhealthy food and drinks. Our research aims to transform policy and practice to encourage and enable healthy environments and behaviours.
- As a result, questions aimed at businesses have not been addressed in SPECTRUM's response.
- Where it is not appropriate for SPECTRUM to respond to a questions as an organisation, we have selected the "do not know" or "not relevant" options with explanations added in the free text boxes.

### **Do you use the Multiple Traffic Light label to make choices about the food and drinks that you buy?**

*Not applicable*

Explanation:

*SPECTRUM represents a number of Universities and partner organisations. It is therefore not appropriate to answer this question for individual members of SPECTRUM. However, it is clear from research conducted by our members, that many members of the public use the Multiple Traffic Light labels as a quick reference to guide and inform their choice of product. Research from the Universities of Bath and Bristol published in the Journal of Health Economics<sup>1</sup> indicates that nutritional labelling on retailers store-branded products led to a reduction in the quantity of pre-packed food items (such a ready meals, pizzas, burgers etc.). This resulted in an improvement in the nutritional composition of shoppers' baskets– and this effect was more obvious in the shopping patterns of those from less affluent households. This research also found a reduction in the total monthly calories from labelled store-brand foods by 588 Kcal, saturated fats by 14g, sugars by 7g, and sodium by 0.8mg.*

*There are a number of variations of the system that are not always directly comparable and can lead to consumer confusion. As a result, we believe that in order to assist those attempting to make an informed and educated decision regarding the products they purchase, the system should be mandatory for all prepacked food and drinks. This should be presented as labels either attached to the product or at the point of selection. Furthermore, online shopping often does not include nutritional information in the form of the Multiple Traffic Light system, thus making it difficult for consumers to make informed decisions when purchasing food and drink products online.*

*Findings from research by SPECTRUM members suggests that introducing a mandatory system would address discrepancies and support consumers to access information that could inform purchasing choices.*

### **Do you find the Multiple Traffic Light label:**

- a. Clear (Y/N)                      Yes

- b. Informative (Y/N)      Yes
- c. Do not have a view

#### How easy do you find the following components of the Multiple Traffic Light label?

- Individual nutrients (fat, saturates, sugar, salt)  
*I do not have a view*
- Use of red, amber and green colours  
*I do not have a view*
- Reference intakes  
*I do not have a view*
- Portion size  
*I do not have a view*

#### How could the Multiple Traffic Light label be made easier to use?

Evidence suggests that the current approach, when adopted by manufacturers and suppliers of pre-packed food and drinks, improves food selection by consumers. Using the traffic light colour coding is a clear and visual guide to the nutritional contents of products. Inclusion of the details related to the nutrient levels included is also known to be rated as useful by almost 90% of consumers, according to a recent poll conducted by Which in 2018. Furthermore, almost 80% agree that the reference intake percentages were equally informative.

In short this approach works well. However, in order to ensure maximum effectiveness, the Multiple Traffic Light Label should be mandatory across all pre-packaged products. Polling by ComRes for Diabetes UK in October 2019 highlighted strong support from UK adults (76% of those polled) for the UK Government to require the food and drink industry, by law, to include traffic light labelling on all food and drink packaging.

#### Would you find it helpful if more products displayed the same Front of Pack Nutritional label?

Yes

#### Do you think you would be likely to use one of these labels more when shopping, compared to current Multiple Traffic Light label?

*I do not have a view*

#### What aspects of the Nutri-score label do you like/ dislike?

[Options like/dislike/I do not have a view]

- a. Use of five colours  
*Like*
- b. Use of letters  
*Like*
- c. Lack of specific nutrition information and portion size  
*Dislike*
- d. Providing a single score for a product to indicate overall healthfulness  
*Like*

*Other (please specify) [Free text box]*

*This scoring system provides an overview similar to the traffic light system already in place, albeit with slightly more nuanced (five colour choices as opposed to three).*

*Similar to the traffic light system, the colours in this system assist the rapid, "at a glance" decisions shoppers may make. It is not clear that the addition of letters brings any added*

*benefit without a dedicated information/mass media campaign to explain their meaning to the general public. Excluding information on portion size or reference intake may limit its utility and thus reduce its effectiveness in helping consumers make informed decisions regarding food and drink selection.*

*If implemented in the UK, this system would require a clear process for the calculation of scores. This process should take into account the existing evidence as well as current nutritional/dietary guidance to ensure robustness, with the latter being of particular relevance to monitoring the intake of specific nutrients – such as salt or fat.*

### **What aspects of the Chilean health warning label do you like/dislike?**

[Options like/dislike/I do not have a view]

- a. Use of colour (black and white only)  
*Dislike*
- b. Highlighting only less healthy options  
*Dislike*
- c. Lack of specific nutrition information and portion size  
*Dislike*
- d. Other (please specify) [Free text box]  
*This particular approach is a step-change from the existing voluntary system within the UK and may confuse consumers more as a result – specifically the move from a colour system that most understand to a black and white panel which may not be easily identifiable on the packaging. The number of panels will vary across products and limits focus to only nutrients considered to be unhealthy.*

### **Both Nutri-Score and health warning labels have been introduced in countries around the world. Can you provide any further evidence on the impact of these labels, on the following aspects?**

- Understanding or identification of healthier choices

Yes

- Healthier purchasing behaviours

Yes

*A 2020 study<sup>2</sup> by Hagman and Siegrist published in Food Quality and Preference reported that a study of Nutri-Score labelling suggested that FoP labelling does improve healthy food choice, but only when applied across all products in the experiment.*

### **Are there any other Front of Pack Nutrition Labels that you think Government should consider?**

Please provide evidence on the following to explain your answer:

- Understanding or identification of healthier choices

Yes

- Healthier purchasing behaviours

Yes

*Images of Child-friendly characters (licensed and non-licensed characters), celebrities and sports stars should be removed from packaging. Rather than making this voluntary, as with the adoption of front of packaging labelling, this should be mandatory in order to support compliance. These images should be considered as a form of marketing, and included in the UK Government's proposals to implement statutory marketing regulation. Such packaging aims to influence children and carer's purchasing behaviours. A UK study found that of 526 products carrying child-friendly TV or film characters and brand mascots, more than half were for HFSS products (Action on Sugar/Salt and Children's Food Campaign, 2019).*

*Recent research also suggests that parents agree that the use of child-friendly characters on food and drink leads to their children requesting or pestering parents for those products; more than 8 in 10 (84%) parents said characters should be removed from unhealthy sweets, confectionery and snack products and nearly 7 in 10 (68%) agreed that the use of characters popular with children on HFSS product packaging makes it more difficult to feed their children a healthy diet (Children's Food Campaign & Food Active, 2020).*

*Action on Sugar/Salt and Children's Food Campaign (2019) Nutrition, health and cartoon animation on food and drink packaging [online] Available at:  
[https://www.sustainweb.org/resources/files/press\\_releases/Children\\_Packaging\\_Report.pdf](https://www.sustainweb.org/resources/files/press_releases/Children_Packaging_Report.pdf)*

**Do you think the Government should ensure that the recommended Front of Pack Nutrition label reflects latest dietary advice on free sugar?**

Yes

*Please explain your answer: [Free text box]*

*Current dietary advice and the new Nutrient Profiling Model should be taken into account when considering free sugar advice for labelling purposes, which we agree should be included on product labels. An educational approach is required to explain what free sugar actually is and the difference between total and free sugar.*

*RCPCCH recommends that the WHO definition of free sugar should be used to support improved labelling of food and drinks products to alert parents and families to free sugar content<sup>3</sup>.*

**Do you think the Government should ensure that the Front of Pack Nutrition label reflects the latest dietary advice on fibre?**

Yes

*Please explain your answer: [Free text box]*

*Consumption of fibre is essential for a healthy diet and many UK adults struggle to consume sufficient amounts of fibre to realise these benefits (PHE, 2019)<sup>4</sup>. Low fibre diets may be associated with certain types of cancer and consumption of whole grain fibre reduces cancer risk. Consumers do not necessarily recognise that it is whole grain fibre specifically that may be beneficial<sup>5</sup>. Thus labelling should make clear the type of fibre being referenced if included on front of pack labels. By including it in FoP labelling, consumers may consider their fibre intake more often than they currently do.*

*Unlike the other nutrients assessed under the current traffic light system however, high levels of fibre are to be encouraged and in this system, would be flagged as red which is associated with a negative connotation. Therefore another approach may be required.*

**Do you think that Front of Pack Nutrition Labelling is likely to have an impact on people on the basis of their age, sex, race, religion, sexual orientation, pregnancy and maternity, disability, gender reassignment and marriage/civil partnership?**

Yes

Please explain your answer and provide relevant evidence. [Free text box]

*Front of pack labels may be less accessible to those with visual impairments (colour blindness or poor eyesight) or those with literacy and numeracy challenges.*

**Do you think that any of the proposals in this consultation would help achieve any of the following aims?**

-Eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010

*I do not know*

-Advancing equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it?

*I do not know*

-Fostering good relations between persons who share a relevant protected characteristic and persons who do not share it?

*I do not know*

Please explain which aims it would help achieve and how. [Free text box]

Could the proposals be changed so that they are more effective? Please explain what changes would be needed. [Free text box]

**Do you think that the proposals in this consultation could impact on people from more deprived backgrounds?**

Yes

Please explain your answer and provide relevant evidence. [Free text box]

*Those who are most affected by overweight and obesity are often from lower socio-economic backgrounds. As outlined in the research highlighted earlier in our response, from the Universities of Bath and Bristol published in the Journal of Health Economics<sup>1</sup>, nutritional labelling on retailers' own-branded products led to a reduction in the quantity of pre-packed food items (such as ready meals, pizzas, burgers etc.) leading to an improvement in the nutritional composition of shopper's baskets where labelling was displayed – and this effect was more obvious in the shopping habits of those from less affluent households. By introducing a mandatory approach to front of pack labelling, all pre-packed foods would have the same nutritional information displayed in a consistent manner. This would provide a more clear and consistent tool to support efforts to address overweight and obesity by providing information to help guide consumer choices.*

**References:**

<sup>1</sup> The response to nutritional labels: Evidence from a quasi-experiment; Journal of Health Economics, ISSN: 0167-6296, Vol: 72, Page: 102326

<sup>2</sup> Nutri-Score, multiple traffic light and incomplete nutrition labelling on food packages: Effects on consumers' accuracy in identifying healthier snack options. Food Quality and Preference, Volume 83, July 2020, 103894

<sup>3</sup> [https://www.rcpch.ac.uk/sites/default/files/2019-06/rcpch\\_prevention\\_vision\\_for\\_child\\_health\\_-\\_june\\_2019.pdf](https://www.rcpch.ac.uk/sites/default/files/2019-06/rcpch_prevention_vision_for_child_health_-_june_2019.pdf)

<sup>4</sup> Public Health England (2019). National Diet and Nutrition Survey

<https://www.gov.uk/government/statistics/ndns-time-trend-and-income-analyses-for-years-1-to-9>

<sup>5</sup> Aune D et al (2011) Dietary fibre, whole grains, and risk of colorectal cancer: systematic review and dose-response meta-analysis of prospective studies *BMJ* 2011;343:bmj.d6617