"Making Healthier Choices Easier: The Role of Labelling"

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I am going to try to make a flat bread, I am sure it will be very flat indeed but I really am going to try that, and I am absolutely salivating after looking at the beautiful cream cakes that Mike has just been showing us so thank you very much for inviting me.

What I would like to do first is tell you a little bit about the Food Standards Agency - I will do that very briefly. We are a non ministerial government department which works in consumer interest in relation to food so that means yes of course we are faceless bureaucrats but we are a non ministerial government department, so when Ministers say jump we don't actually jump we make up our own minds about what we are going to do. So we are a different government department and our USP is that we actually work for the consumer particularly.

What I am going to talk about this morning is one of the things which we are doing to try and help make healthier choices easier. This is just one of the issues from the very interesting and high profile debate which is going on at the moment about diet and health, attracting an enormous amount of attention both domestically and internationally, and in particular I am going to talk about nutrition labelling.

I want first of all to talk a bit about the context for that work and the very broad context of that work is in a white paper which was published in the Autumn last year, November 2004, in response to concerns about particular health issues, where it was generally agreed that prevention has the potential to save us a huge amount of money that is spent in the NHS on treatment and cure and particularly sexual health, smoking and obesity, and of course what I am going to talk about is part of the obesity. The two headlines that came out of that particular white paper were the smoking ban and work around advertising junk food to children. So those are the two headline measures but the white paper contains a very wide range of activity so in relation really to three strands I am going to be looking at one strand, just to paint that whole picture. The first strand is diet, so addressing people about the way they interact with food, the way they interact with the physical activity because clearly obesity is about the balance between what calories you take in and the energy you expend so there is a whole range of activity around education both in schools and in educating the general public through campaigns. The second Activity around addressing products and we already had a reference this morning to the work around reducing salt in

food so that people actually can improve their diet without making the conscious choice to do so because the product itself is actually changing, and that work is already beginning to produce benefits and we are now looking at the potential to look at fat and sugar in exactly the same way.

The environment in which those people make their choices between those products is helping people to make healthier choices. Part of the environment is about labelling. It is clear there is no feeling anywhere that there is one single answer to the problem which we find ourselves with, in terms of public health, obesity, poor diets etc. There is nothing actually that the Government can do; it really is up to the consumers and the industry. It's in the hands of the consumers who are going to make choices about their diets, and it's in the hands of the industry to look at what it can do to help. So we are feeling very much that the Government should be working with consumers, it should be working with the industry in partnership to tackle the public health problems that we have as a country.

So that's the background and in particular I am going to talk about two aspects of labelling. I am going to talk about the back of the pack information, the nutritional panel which we are all familiar with but I am also going to spend most of my time talking about the idea of working with the industry to provide information on the front of the pack, which we call signposting. A clear straightforward way of helping people to understand the nutrient profile of individual products. To deal with nutrition labelling first, information which is provided on the back of most packs of food in the UK at the moment. The European Commission is currently looking at the rules of nutrition labelling with a view to seeing whether they are working and all the signs are that the Commission is interested in making nutrition labelling on the back of the pack mandatory, with perhaps some exceptions such as small packs but essentially to say that if we are going to ask people to make healthy choices, then we have to give them the information which they need to make those healthy choices and the way to do that is by providing nutrition information. So the European Commission is clearly looking at whether it should impose mandatory nutritional information on the back of the pack and it is working very hard on a impact assessment because clearly particularly for small businesses the impact of such a measure

would be significant, so it's looking very carefully at the impact thrust in the direction of mandatory information, and it's looking at which nutrients should be covered, what's the most appropriate format to use and how quickly could we expect the labels to be changed. So the expectation is that those considerations which the Commission is discussing at the moment will result in a proposal being made during 2006, and negotiated during 2006 and probably during 2007. So that's the back of the packaging.

Now as I said I want to move to the front of the package and the issue of signposting which has really taken off as an idea in this country. Used in supermarkets very frequently, and most major retailers have a healthy option type range of some sort which they signpost on the front of the pack through a particular product range descriptor, and the idea is to attract people's attention with the healthy option and encourage them to buy within the product range. The Health Select Committee which looked at obesity about a year ago, was very taken by the idea of signposting and recommended that the government should encourage front of label signposting around the amount of calories in a product. Very much welcomed I think right across the board as a good idea, and what we have been doing at the Agency is looking at how you might go about this, what might work in practice, and in doing so we have been very much focused on composition of foods. So particularly looking at things like bread rolls because we know that there are huge differences in composition and it's not at all obvious to consumers that those differences are there. So we haven't if you like been focusing on some of the products that we were talking about this morning, but it may be that there is potential for moving into that sector, but I think it is important to say in the first instance that the concentration is on composite foods. So we've been doing some consumer research and we've been looking at a very wide range of people's views about the idea of signposting. We've got a range of socio-economic classes very much focusing and emphasising and over-representing C2DE social economic groups, because those are the areas where poor diet guality issues and the health problems that go with those diets are worse than they are in other groups of the population. We've been looking at the strengths and weaknesses of different ways of signposting and investigating people's understanding. The first thing to say is that in that material research we have encountered enormous overwhelming support from consumers for the idea of something which helps making healthier choices easier. All the research that's been done in this area

tends to reinforce the idea that there's an awful lot of people who want to make healthier choices, but in practice they don't do so, part of, not all, of why they don't do so, is that they don't have an understanding of the composition of individual foods, so they don't know how in practice to make healthy choices. There is of course also a huge issue around motivation and translation of motivation into behavioural change, but a part of the picture is also a lack of information which is where the label comes in. So people said to us in this research they do think that providing simplified information on the front of the pack would help them make healthy choices. In all those different areas between brands and between products, and between categories of products are very interesting, and they said completely unprompted, that it would help force them to re-evaluate the choices that they make on the go, and I think we all shop in this way. We pick up most of the things that we picked up last week or last month, and there are some new to us, where we might look at the label and think about it and wonder whether that's for us or not for us. But most of the things which we pick up, we pick up because we always pick up - it's the breakfast cereal we had as a child, but whatever it is, so people said to us guite unprompted, it would be helpful to actually have some information about those that in a sense you are forced to look at because it's on the front of the pack. There is a very strong feeling that this is an area where the interests of both government and consumers actually coincide, that's the area of making healthy choices.

So the first idea we put out is the simple traffic light. This is the one which the media always focuses on so the idea for the food to fall into one of those three categories would get a green light which meant you could eat plenty or it would get an amber light - use in moderation, or a red light - eat sparingly. That information would help people to balance their diets, and in the consumer research people liked this. They thought the idea was very easy to grasp, that it really would help them to reevaluate those auto pilot choices and help them to balance their shopping. But there was already even in this first consumer research, something coming through in terms of `perhaps that was a bit too simplistic'. A lot of people saying things like well I am actually particularly interested in salt, I am particularly interested in saturated fat. I want to know about that, I don't just want one piece of information. So there was a suggestion that perhaps although it grabs the eye, it's easy to understand, it's actually too simplistic and to go back there was also some resistance to the message that went with it, eat plenty, eat in

moderation, eat sparingly, which seemed to fall on a line between healthy information and telling people what to do. Some people felt that that was going too far and was telling them what to do. They didn't go shopping to be told what to do.

The second option we looked at, we call the extended traffic light, but its only extended in the sense of instead of having three categories to have five of the codes there to indicate what the messages would be. This shared some positive attributes of the previous option, simple, there was a feeling that it gave you a bit more choice than the single traffic light but really people felt that having five bands was really just too much to cope with, and in practise they would probably just look at the two ends and perhaps the middle, so in fact in their minds they could collapse five down to three.

The third option we looked at was the healthy eating programme and this is very similar to the schemes that we see in the major retailers, and this is a logo which would only appear on products which met a particular set of criteria. So it's like the single traffic light, but there are only green lights and if there is nothing on the product, then it's either an amber or a red or since it is a voluntary scheme, it's something that's not in the scheme.

We thought that might be quite popular because we thought people would like the positive message and perhaps wouldn't like to hear the negative messages, and there was some positive feedback in the focus group work that we did, people liked the simplicity, they liked the encouragement aspect of it, but they said they felt that it would really only work if read or were very motivated. It would only work for people who were already looking for those healthier options and crucially it wouldn't confront the existing choices, so rather surprising perhaps it really was not liked.

The fourth option we looked at we called the multiple traffic light, and this gives four signs per product, so there is a traffic light for fat, a traffic light for salt, a traffic light for sugar and a traffic light for saturates. So there are four pieces of information and it's more complicated than the simple traffic light but it is very explicit about the content of particular nutrients. This was received very positively, people found it very easy to understand, they liked the fact that it was explicit about what it covered so it didn't suffer from being over simplistic as the simple traffic light does. They liked the fact that it was factual rather than advisory, they liked the fact that it's telling people information to use as thought fit. They liked the fact that it highlighted key nutrients so that if they had a

concern about salt or saturates then clearly there was the information to help them make a decision. But there was a bit of concern about how they would deal with a product which had maybe three different colours on it, so there was a bit of liking the simplicity, liking of the factual nature of it, but some concern about the complexity of having four signals.

Lastly we looked at this one, which gives some very useful information, it gives the amount of a particular nutrient in a portion of the product and it gives the amount of that nutrient that should be eaten during the day, so it's very useful information there to help people to put the product in the context with everything else they are eating that day. People did feel with that one, that it was nice to know what the target amount was and they felt it was helpful in some respects, but overwhelmingly overall they felt that it was really just far too hard to understand, and that in practice to be doing that sort of mathematical comparison when trying to get in and out of a supermarket with everything else that is going on in the supermarket, it's not going to happen.. Really to look at the back of the pack and the front is not helpful.

So out of those 5 there were 2 concepts, the simple and multiple traffic lights which looked very promising. We also did a bit of some other work, which I won't talk about, but the outcome was that this was felt to be the right thing to do in a pre packed composite food environment. So we discussed the findings of this research with the stakeholders, and the stakeholders agreed that it would be good to go forward with the single and multiple traffic lights. But they also felt that the last of those formats that I showed, which has very useful information on it, which consumers didn't like in the way in which we executed it, might fair better if it was executed better. So we agreed to do a bit of extra work on the execution of that format to see whether we could make it work better. So we tried providing information in tabular form but people found that generally uninviting and found it difficult to use that format. We used a format which added some colour coding, that was the most popular of the formats that we looked at. People liked the colour coding - it made the whole thing more inviting but there was a feeling that probably this was going to be working exactly the same way as the multiple traffic lights, and that is people would be focusing on the colours and not looking

at the numbers. We tried using bar charts and it was a qualitative rather than quantitative study but broadly half and half About half the people that we spoke to said that bar charts weren't for them, that they finished with bar charts when they left school, they weren't going back there and that wasn't really going to work for them. So bar charts are a complete turn off for some people, on the other hand there were actually probably half the people who said well actually I hated those numbers when you showed them to me, but when you showed me the bar charts I could see it straight away, so they work for some people and don't work for others unfortunately.

We tried the bar chart with colour coding and certainly some of the people who hated bar charts could just look at the colours and ignore the bar charts, but even some of the people who hated bar charts couldn't cope with them when they were coloured. They were just completely turned off by the format. There was another issue with bar charts, which was that there were a sizeable number of people who misinterpreted them so they thought instead of the bar chart indicating the amount of their daily allowance, it was the amount that was actually in the food itself. So that was quite an easy confusion to make, so the bar chart is not actually providing the information in a helpful way to many consumers although for others it works extremely well.

So overall as I said, we found from those executions the one that worked best, none of them were perfect but we thought the number with colour coding would probably work better than any of the others. So we now have 3 formats, we have the simple traffic light where we have moved away from advice on what to do, to something a bit more factual. We have got the multiple traffic light and we have got the colour coded format, which gives information about how much percent of our daily allowance is acceptable. The next step is to do some quantitative research, so to take more than a thousand consumers and confront them with these formats of products, ask them to use them in a way that has some similarity to the *way* they would when they were shopping, and see which they could use effectively. We should also be getting quantitative information. The idea is that having done that quantitative research, people would have a preferred option which we will want to talk with industry about and take it forward as a single option.

Question: Thank you very much that was an excellent presentation, very clear. Could you tell me what criteria you use to decide which foods come into the three traffic lights?

A very good question

We have another stream of work which I haven't spoken about which is around developing criteria both to underpin schemes of this sort, but also because we have a particular stream of work which has been looking at what we call nutrient profiling, which looks at the whole range of nutrients and it's aimed particularly at the activity around controls on promotional foods to children. So the white paper made a commitment to look at tougher controls on advertising, particularly broadcast advertising of foods to children and to move the skew which currently is in favour of less healthy foods, towards encouraging more healthier. But of course to do that we have to have a definition of why those two things are healthier and the rest are not. So we have a whole stream of work around that and consulting on a proposal running through to about 17 February, and that work will lead to publication of those criteria, probably in around a couple of months' time. So if we went with the simple traffic light that would be the basis of the criteria for that. Separately if we are going to go with the multiple traffic light, then we really need criteria there and we have been doing some preliminary work about what the criteria would be, and what's particularly important there, is that clearly a green traffic light is equivalent to low fat claim and we already had government agency advice of how much fat there should be in a product that is going to make a low fat claim, and there is European legislation being discussed which sees the same criteria. So clearly that would be the starting point because we can not have a traffic lighting system which is inconsistent with claims, so the starting point will be existing low fat, low salt, low sugar, low saturated fat advice, which we already have and we will have to consult on where we put the other lines between the red and the amber. So that is not decided as yet, but we have some ideas which we are considering and certainly something like bread which is certainly low fat, low saturates, low sugar. There might be some breads that are already in the low salt category and I think we would have to think about whether we place the bands in a way which encourages innovation, and obviously encouraging innovation in terms of reducing salt content is something we very much want to do, and that argues placing the bands just below where people are at the moment to try and get them to tip over. So we have to have a debate about what is nutritionally appropriate and what encourages innovation, and balance those two issues to determine where we place the bands.

So I hope that I have given you a flavour of what's happening in that one single area of encouragement of healthier eating. As I have said its focus in the first instance is very much on choices in the composite food area which is part of your interest, although I appreciate not the whole of it. It does seem to mean that actually a loaf of bread with a traffic light on would look very much like a very healthy option and as came out of the discussions earlier with Paul, one of the main facts of the healthy eating advice is to eat lots of starch and carbohydrate, and to eat wholegrain and bread is actually an excellent way of doing that, so that I hope that there is potential for this sort of activity to help to carry that message forward to the consumers. Applause...