

## **Building on the success of front-of-pack nutrition labelling in the UK: a public consultation**

*NB: This is an online consultation and we are only responding to relevant questions. We are not able to respond to questions about our use of labels as we are responding as an organisation.*

**6a) Do you use the Multiple Traffic Light label to make choices about the food and drinks that you buy? [Tick box - always/very frequently/sometimes/rarely/never/Prefer not to say/Not relevant]\***

**6b) Please explain your choice [Free text box]**

The Royal Society for Public Health supports the use of the Multiple Traffic Light Label on food and drink products as a tool to inform consumers about the nutritional content of their purchases. As a health education and campaigning charity, obesity is a priority area for us and we have previously called for clear and consistent food labelling.<sup>1</sup> In a list compiled at the end of 2019 the Multiple Traffic Light label was voted as number 11 out of 20 Top Public Health Achievements of the 21<sup>st</sup> century so far by a panel of public health experts.<sup>2</sup>

The evidence shows that the Multiple Traffic Light label helps consumers identify healthier products, although we acknowledge that stronger evidence is needed around the translation of healthier product identification into increased purchasing of these products.<sup>3</sup> Research has indicated that actual use of nutrition labelling during food purchasing is lower than reported use.<sup>4</sup> The lack of evidence about the Multiple Traffic Light label actually changing purchasing behaviour is concerning, particularly as many of the studies that show the label is used to identify healthier products rely on self-report, and therefore have a large response bias.

Nevertheless, polling conducted by Censuswide for the British Heart Foundation in September 2020 found that 66% of people use the Multiple Traffic Light label always, often, or sometimes to make purchasing choices. Additionally, polling conducted by ComRes for Diabetes UK in October 2019 indicated that 82% of UK adults agree that the traffic-light labelling system helps people to make informed choices about the food they buy.

Therefore we view the Multiple Traffic Light label as a useful educational instrument that has the potential to improve diet, but acknowledge that it is by no means a silver bullet to achieve this goal, and could perhaps be adapted to have greater impact.

**7a) Do you find the Multiple Traffic Light label:**

- Clear (Yes/No/**I do not have a view**)
- Informative (Yes/No/**I do not have a view**)

**7b) How easy do you find the following components of the Multiple Traffic Light label?**

- Individual nutrients (fat, saturates, sugar, salt) [Tick box – very easy/easy/moderate/somewhat difficult/difficult/**I do not have a view**]

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<sup>1</sup> <https://www.rsph.org.uk/our-work/policy/obesity.html>

<sup>2</sup> <https://www.rsph.org.uk/our-work/policy/top-20-public-health-achievements-of-the-21st-century.html>

<sup>3</sup> <https://link.springer.com/article/10.1007/s11747-019-00663-9>

<sup>4</sup>

[https://www.researchgate.net/publication/8028200\\_Consumer\\_understanding\\_and\\_use\\_of\\_nutrition\\_labelling\\_A\\_systematic\\_review](https://www.researchgate.net/publication/8028200_Consumer_understanding_and_use_of_nutrition_labelling_A_systematic_review)

- Use of red, amber and green colours [Tick box – very easy/easy/moderate/somewhat difficult/difficult/**I do not have a view**]

- Reference Intakes [Tick box - very easy/easy/moderate/somewhat difficult/difficult/**I do not have a view**]

- Portion Size [Tick box - very easy/easy/moderate/somewhat difficult/difficult/**I do not have a view**]

#### **8. How could the Multiple Traffic Light label be made easier to use? [Free text box]**

The Multiple Traffic Light label could be made easier to use in a number of ways:

A). Individual nutrients can be hard to understand when displayed as weight. For instance, 10g of fat is difficult to quantify and visualise, and therefore may not resonate with many people. An equivalent, easy to understand figure could be used instead, for example teaspoons of sugar instead of grams.

B). Reference intakes are easy to understand when displayed as a percentage of the recommended daily intake, and should always be displayed clearly in this way.

C). Portion size could be made easier to use by explicitly stating what one portion of the product is, for example 'one portion is one grilled burger'.

D). Previous RSPH research asked young people their views on how they would address obesity.<sup>5</sup> On food labelling, young people reported that they want to see labels appropriate for children and adults, with clear information such as the nutritional content for the whole product, alongside the 'per serving' values.

Above all, for the Multiple Traffic Light label to be more effective it must be applied across all foods. The current scheme is only required on certain categories of foods such as ready meals and pizzas. The scheme should also be applied to fruit and vegetables, and breads, as it will allow consumers to better understand the foods they eat. It is as important for consumers to understand which foods are green, along with which foods are red. If it is impossible to put the Multiple Traffic Light label on the food it should be put on the shelf. With one system in place across all foods and drinks it would be advisable to run an education and awareness raising campaign to increase impact.

#### **9. Would you find it helpful if more products displayed the same Front of Pack Nutrition label? [Yes/No/I do not have a view]\***

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

- Use of five colours [Tick box - **like**/dislike/I do not have a view]

- Use of letters [Tick box - **like**/dislike/I do not have a view]

- Lack of specific nutrition information and portion size [Tick box - like/**dislike**/I do not have a view]

- Providing a single score for a product to indicate overall healthfulness [Tick box - **like**/dislike/I do not have a view]

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

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<sup>5</sup> <https://www.rsph.org.uk/our-work/policy/obesity/the-child-s-obesity-strategy-.html>

Although the Nutri-score is simplistic as it doesn't provide the consumer with nutritional information, some consumers may find this useful. There is evidence that the Nutri-score is more accessible to consumers from lower socioeconomic groups.<sup>6</sup> Consumers may find simple schemes such as the Nutri-score or Choices Nutrition Criteria<sup>7</sup> helpful for distinguishing which products are healthy at a glance. We would welcome further research on the use of the Nutri-score as a method of influencing dietary behaviour across the socioeconomic groups.

If this system were to be introduced in the UK, consumers would have to become familiar with a whole new type of classification, when we know that they view the current system favourably.<sup>8</sup> Additionally, the lack of nutritional information could be a disadvantage to some consumers with specific health requirements, such as information on the amount of sugar in a product for individuals with metabolic syndrome.

The Nutri-score could be added on food packaging alongside the Multiple Traffic Light label, so that consumers can ascertain the basic 'healthfulness' of a product, yet still have access to the more detailed nutritional information. We suggest that further research is conducted to understand the full implications of this change on consumer identification and purchasing of healthier products, in comparison with the impact of the Multiple Traffic Light label.

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

- Use of colour (black and white only) [Tick box - like/dislike/I do not have a view]
- Highlighting only less healthy options [Tick box - like/dislike/I do not have a view]
- Lack of specific nutrition information and portion size [Tick box - like/dislike/I do not have a view]

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

Although there is not much information provided on the Chilean health warning label, it could be a useful supplement to have on food and drink packaging, in addition to the Multiple Traffic Light label. The stark warning on cigarette packets and the reduction in smoking prevalence demonstrates how successful this type of intervention can be at contributing to behaviour change;<sup>9</sup> however we need more research to establish if this would be the case with food warning labels. We need firm evidence that the simplicity of the warning label works across all social groups, in order to contribute to the effort to reduce health inequalities.

A warning label could place greater emphasis on avoidance of less healthy products; one study showed that consumers pay more attention to avoiding products with red labels.<sup>10</sup> We need further research to establish whether consumers are more motivated by positive change, and whether having an additional warning label alongside the red Traffic Light Label could drive consumers towards healthier products. The warning label could be a useful tool to cut through misleading food marketing, and indicate which products should be consumed occasionally as treats.

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<sup>6</sup> [https://www.ernaehrungs-umschau.de/fileadmin/Ernaehrungs-Umschau/pdfs/pdf\\_2017/12\\_17/EU12\\_2017\\_WuF\\_Nutriscore\\_englisch.pdf](https://www.ernaehrungs-umschau.de/fileadmin/Ernaehrungs-Umschau/pdfs/pdf_2017/12_17/EU12_2017_WuF_Nutriscore_englisch.pdf)

<sup>7</sup> <https://www.choicesprogramme.org/our-work/nutrition-criteria/>

<sup>8</sup> [https://www.diabetes.org.uk/about\\_us/news/poll-food-labels-influence-spending](https://www.diabetes.org.uk/about_us/news/poll-food-labels-influence-spending)

<sup>9</sup> <https://www.sciencedirect.com/science/article/pii/S0277953616302921>

<sup>10</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4676872/>

**14) 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/No/I do not know**]. Please upload evidence.

- Healthier purchasing behaviours [**Yes/No/I do not know**]. Please upload evidence.

There is evidence that the Nutri-score is associated with higher nutritional quality purchases.<sup>11</sup>

Evidence from Chile suggests that the warning label performed better than other systems in terms of consumers assessing the nutritional value of a product, and further studies indicated that significant product reformulation did take place when this labelling system was introduced.<sup>12</sup>

**15) 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 [**Free text box**]

- Healthier purchasing behaviours [**Free text box**]

We suggest the Government extends the relevant components of Front of Pack Nutrition Labels to alcoholic drinks – namely calorie information, accompanied with information on alcohol units. Research conducted by RSPH found that only 16% of the public were aware of Government guidelines on alcohol-unit consumption, only one in ten knew of the link between alcohol consumption and the risk of cancer, and 80% did not know the number of calories in a glass of wine.<sup>13</sup> We recommend calorie content per container or per serve is provided on the front label – our research indicated this could result in an almost 10% swing in consumer purchasing decisions from the highest alcohol drinks to the lowest, within all main drink categories and across all socio-economic groups.

Learnings could be taken about understanding and purchasing of healthier options from the Nordic Keyhole labelling system. The Keyhole symbol is a simple way of identifying healthier products.<sup>14</sup> It is well recognised by consumers and was received well by industry when introduced.<sup>15</sup> This easy to understand indicator may provide further evidence to help inform whether adding further information, such as the Nutri-score or Chilean warning label, could be a helpful addition on packaging alongside the Traffic Light Label.

**16) Do you think the Government should ensure that the recommended Front of Pack Nutrition label reflects latest dietary advice on free sugar? [**Yes/No/I do not know**]\* Please explain your answer [**Free text box**].**

The Front of Pack Nutrition label should reflect the latest dietary advice on free sugar in order to align with the new Nutrient Profile Model and to provide consumers with the most up-to-date

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<sup>11</sup> <https://apps.who.int/iris/bitstream/handle/10665/325207/php-3-4-712-725-eng.pdf>

<sup>12</sup> <http://www.fao.org/3/ca1314en/CA1314EN.pdf>

<sup>13</sup> <https://www.rsph.org.uk/our-work/policy/drugs/labelling-the-point.html>

<sup>14</sup> <http://norden.diva-portal.org/smash/get/diva2:700822/FULLTEXT01.pdf>

<sup>15</sup>

[https://www.who.int/nutrition/events/2013\\_FAO\\_WHO\\_workshop\\_frontofpack\\_nutritionlabelling\\_presentati on\\_Sjolin.pdf?ua=1](https://www.who.int/nutrition/events/2013_FAO_WHO_workshop_frontofpack_nutritionlabelling_presentati on_Sjolin.pdf?ua=1)

information. We recognise that greater public knowledge of the difference between free sugars and total sugars is needed to make this a useful addition to food nutrition labels. The existing colour coding system (red/amber/green) would translate well to convey health information about free sugars, and may be a useful way of increasing public understanding.

**17) Do you think the Government should ensure that the recommended Front of Pack Nutrition label reflects the latest dietary advice on fibre? [Yes/No/I do not know]\* Please explain your answer [Free text box].**

Yes, nutritional information on fibre should be provided on the Front of Pack Nutrition label. It is important to add information on this, as fibre is a necessary component of a healthy diet, yet most UK adults do not consume enough fibre.<sup>16</sup>

Adding fibre to the current Front of Pack Nutrition label needs careful consideration, as the current colour coding system would be confusing; red indicates high levels of less healthy nutrients, while green indicates low levels of less healthy nutrients, and therefore a healthier product. The reverse would be true for fibre; green to indicate high levels of fibre, and red to indicate low levels. Therefore we suggest further consumer research is conducted to assess the best way to display this information so that it is easy to understand.

**18a) 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/No/I do not know].

**18b) Please explain your answer and provide relevant evidence. [Free text box]**

Manufacturers should make Front of Pack Nutrition Labelling legible and easy to read for people with literacy issues and visual impairments. Although the colour coding is important to aid, the text should also be easy to understand. There could be penalties applied to manufacturers who fail to do this.

Front of Pack Nutrition Labelling may have a negative impact on people with eating disorders, particularly young women who are most likely to have an eating disorder.<sup>17</sup> Beat Eating Disorders responded to the Government's latest obesity strategy that changes to menus, such as mandating calorie labelling, poses a risk to those with eating disorders.<sup>18</sup> Any changes to Front of Pack Nutrition labels should be viewed with caution and researched further regarding any potential negative consequences for people with eating disorders.

**19a) 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 [Yes/No/I do not know]**

**-Advancing equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it? [Yes/No/I do not know]**

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<sup>16</sup> <https://www.gov.uk/government/statistics/ndns-time-trend-and-income-analyses-for-years-1-to-9>

<sup>17</sup> <https://www.beateatingdisorders.org.uk/types>

<sup>18</sup> <https://www.beateatingdisorders.org.uk/policy-and-reports/statements/changes-anti-obesity-strategies>

**-Fostering good relations between persons who share a relevant protected characteristic and persons who do not share it? [Yes/No/I do not know]**

**19b) Please explain which aims it would help achieve and how. [Free text box]**

NA

**19c) Could the proposals be changed so that they are more effective? Please explain what changes would be needed [Free text box]**

We would welcome further exploration of the effectiveness of combining Multiple Traffic Light labels with the Chilean style warning labels on purchasing behaviour. Although there is evidence suggesting both the Nutri-score and Chilean warning labels are effective at improving identification and purchasing of healthier options, we believe that the simplicity of the warning label could work well alongside the more detailed information provided in the Traffic Light label. Combining the Traffic Light label with the Nutri-score could be too complicated and too much information for consumers to take notice of. Further research on this is needed.

**20a) Do you think that the proposals in this consultation could impact on people from more deprived backgrounds? [Yes/No/I do not know]**

**20b) Please explain your answer and provide relevant evidence. [Free text box]**

People from deprived backgrounds could be negatively impacted by these proposals, as they may not bring as much benefit to this group as to more affluent groups. For people from more deprived backgrounds, the price of food is an important factor when making purchasing decisions. Healthier food is three times more expensive than less healthy food,<sup>19</sup> so having additional nutritional information on products may not have much of an impact on purchasing decisions if people are not able to afford healthier options. The prevalence of childhood obesity in England is over twice as high in the most deprived areas than the least deprived areas,<sup>20</sup> and unless healthier food is made more affordable, there is a risk this inequality will widen, regardless of the nutritional information provided on food and drink products. Therefore the proposals are unlikely to address inequalities; for this it is vitally important that the affordability of healthy food is addressed, though we recognise this is outside of the current consultation scope.

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<sup>19</sup> <https://foodfoundation.org.uk/wp-content/uploads/2020/09/FF-Broken-Plate-2020-DIGITAL-FULL.pdf>

<sup>20</sup> <https://digital.nhs.uk/data-and-information/publications/statistical/statistics-on-obesity-physical-activity-and-diet/england-2020>