Joint Response from Action on Salt & Action on Sugar to *Front-of-pack nutrition labelling in the UK: building on success*

Action on Salt

Action on Salt (formerly Consensus Action on Salt & Health, CASH) is an organisation working to reduce the salt intake of the UK population to prevent deaths, and suffering, from heart disease, stroke, kidney disease, osteoporosis and stomach cancer.

Action on Sugar

Action on Sugar is a group of experts concerned with sugar and obesity and its effects on health. It is working to reach a consensus with the food industry and Government over the harmful effects of a high calorie diet, and bring about a reduction in the amount of sugar and fat in processed foods to prevent obesity, type 2 diabetes and tooth decay.

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Background

There can be no denying that suboptimal diets are the leading risk factor for death and disability worldwide, leading to 11 million deaths in 2017 (1). High salt intake raises blood pressure, which in turn increases the risk of developing cardiovascular disease. High salt intake is also linked to kidney disease, osteoporosis and stomach cancer (2).

High sugar intake is associated with type 2 diabetes and is the leading cause of dental caries. Excess calorie intake is associated with obesity, which affects 12 million people in the UK. It is well evidenced that to mitigate the healthcare burden resulting from non-communicable diseases (NCDs), providing clear information on the nutritional profile of products can nudge consumers to healthier food and drink options (3). FOPL labelling can also positively encourage manufacturers to reformulate their products to achieve a more healthful profile. As such, the World Health Organization recommends FOPL to promote healthy diets in the entire population and help reduce NCD prevalence (4).

The UK's FOPL multiple traffic light (MTL) system has been in place in its current format since 2013, but FOPL has existed in some form for several years prior to this. Disappointingly, this consultation is not accompanied by an impact analysis of the current system or any proposed future FOPL system and at no point is mandated FOPL proposed.

We have concerns around the wording of this consultation, which seeks evidence on the impact of front-of-pack nutrition labelling (FOPL), whilst also seeking industry and the public's views. Public opinion could be better sought with an alternative format than the one presented in this consultation. A consultation is not the most appropriate medium to assess views; focus group discussions, opinion surveys and real-life research should be utilised instead. We are concerned that, given the food and drink industry have vested interests in less regulation and labelling requirements, this is yet another opportunity for them to 'delay, divide, deflect, and deny' and ensure that any future FOPL scheme works in their favour, not their consumers (5).

Multiple Traffic Light (MTL) Labels

We are supportive of mandatory colour coded FOPL. Results from a recent meta-analysis found colour coded FOPL labels led to an 18% increase in those consumers able to correctly identify the healthier option from a range of products, as well as a decrease in calories consumed by 4% (6). Results from our unpublished systematic review and meta-analysis (more information can be given if necessary) have revealed that all colour-coded labels have a beneficial effect by encouraging the purchase of healthier products, preventing the selection of less healthy options and improving the overall nutritional quality of purchases, with no difference across label type. It does appear that color-coded labels perform better in nudging the purchase of healthier products, wherein Nutriscore is more effective than traffic light labels, but consumers generally preferred traffic light labels as Nutriscore was considered arbitrary. However, due to the heterogeneity in studies and the small number of studies focused on Nutriscore relative to traffic light labelling studies, the true difference between label types remains to be elucidated.

However, while both MTL and NutriScore are colour-coded, we are inclined to support MTL at this stage, especially in the absence of a UK-based real-life study that has tested consumer preference and understanding of different labelling systems, and without an impact analysis that clearly demonstrates the benefit of one labelling type over another. Such an impact analysis would need to consider the historical use and cultural relevance of MTL, both on packaging itself, and in many forms of health communication about food and drink (7). UK consumers are familiar with MTL, and a recent study found that familiarity with a labelling system mediates intention to use (8).

Furthermore, while NutriScore, which gives an overall grade and colour to a product, is dependent on the sum of its nutrients, MTL colours are applied to individual nutrients. This is of benefit to those with health conditions - for example those with high blood pressure. Hypertension affects more than one in four people in the UK, and many more are undiagnosed (9). They should have the option to choose lower salt products; MTL displays at a glance whether a product has a green (low), amber (medium) or red (high) level of salt. Similarly, those with type 2 diabetes should be able to easily identify lower sugar products and those with high cholesterol would need to locate products lower in saturated fat.

Public Understanding and Use of Labels

There is a strong body of research demonstrating the effectiveness of MTL, including how it is easily understood by those with lower literacy and numeracy attainment, which we will not lay out here. There are also several public opinion surveys that demonstrate that UK consumers both value and utilise the MTL FOPL system. Polling conducted by Censuswide for the British Heart Foundation in September 2020 found high usage of MTL with a third (33%) of people saying they always or often use the front-of-pack Traffic Light label to make choices about the food and drinks they buy. A further 30% said they sometimes used the label in this way (10). 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. Three quarters (76%) of those polled agreed that the UK government should require by law that the food and drink industry include traffic light labelling on all food and drink packaging (11). Polling conducted for Which? in 2018 found that 91% of people found the use of traffic light colour coding helpful in understanding the nutritional content of packaged food (12). This label was developed using extensive engagement with UK audiences. The same could be true for NS, and there is good evidence from other countries that it is simple to understand, however we would like to see further research done in the UK.

Reformulation

FOPL not only encourages healthier purchases; it has been long established that FOPL also encourages food and drink companies to reformulate their products by reducing negative nutrients.

Evidence submitted by Sainsburys and Asda to the House of Lords Science and Technology Committee back in 2011 indicated that MTL increased the demand for healthier foods, which in turn stimulates manufacturers to reformulate their products to achieve a healthier profile – and colour code – to meet this demand (13). Sainsbury's also state on their website that they were the first retailer to introduce MTL, in 2005, and since 2015 they have been committed to reducing the number of 'red lights' displayed on their own-brand products, with an ambition to reach just one in five (21%) products displaying any red label by 2020 (14). The Cooperative defines 'healthy' products as those without red labels and Tesco also use MTL thresholds when applying their Healthy Choice logo. While the same could be expected for Nutriscore (i.e. companies may internally specify that unhealthy products are classed as 'D' or 'E'), this is not yet known.

MTL Improvement

While we are supportive of MTL, we do strongly recommend the following improvements to the system to ensure the greatest, positive impact on consumers.

- **Mandatory Labelling**

We are disappointed to see that at no point in this consultation is it proposed that our current FOPL system, or any future FOPL system, will be mandated. FOPL must be made mandatory if we are to have transparency, scrutiny and enable consumer choice across all income levels while creating a necessary level playing field to ensure consistency across all food and drink products. Voluntary FOPL systems are adopted slowly in the marketplace, and consumers also perceive the products without FOPL as healthier, even though the nutritional quality might be worse (15).

Despite being in place and recommended by the Department of Health since 2013, a significant proportion of products still do not use the MTL system, due to its voluntary nature. Research that informed DHSC's original 2013 consultation on FOPL stated that market penetration and consistency are key to comprehension and use of FOPL – which would be true of all labelling systems (16).

Our recent cross-sectional surveys (17) reveal a huge variance on the number of products displaying FOPL, depending on the category surveyed:

Product Category Surveyed	Percentage of Products Displaying FOPL
Sauces (e.g. soy sauce, fish sauce)	19%
Pesto	29%
Gluten Free Snacks	33%
Savoury Finger Food	71%
Bacon	74%
Meat Alternatives	80%
Sausages	83%
Pre-packed Salad	91%

In addition, front-of-pack labelling is frequently unavailable, or not clearly visible, when shopping online. Consumers are relying more heavily on online shopping and delivery platforms, particularly in light of the pandemic, and therefore retailer websites and all delivery apps should be required to

clearly display colour-coded labels for all food and drink products available for purchase through their websites/apps.

We strongly recommend the government mandates FOPL use across all food and drink – on pack, online or at any other point of choice - to ensure that everyone who wants to use FOPL to make healthier choices, can always do so.

- **Portion Size**

While guidance exists on recommended portion sizes to guide individuals in eating a healthy, balanced diet, there are no standard portion sizes for companies to abide by. Our cross-sectional surveys (17) demonstrate the variance in portion sizes:

Product Category Surveyed	Portion Sizes Displayed on Pack
Soft Drinks	150ml – 500ml
Children's Juices	85ml – 500ml
Pizza	1 Slice – Whole Pizza
Energy Drinks	60ml – 500ml
Breakfast Biscuits	1-4 Biscuits
Sweet Spreads	15g – 30g
Blueberry Muffins	64g – 124g
Salads	50g – 400g
Breakfast Cereals	30g – 45g

It is possible that companies suggest smaller portion sizes to avoid a red front of pack label, as the MTL system includes cut-offs for per 100g/100ml and per portion. Which? Research found that just 45% of Which? members check recommended portion sizes, but of those that check them, 70% stated the portion sizes influenced how much they ate, and more than half (54%) were surprised by how small the recommended portion was. Which? found on average that their members served themselves 63% more breakfast cereal than the recommended portion size, with Fruit and Fibre being the most commonly over-served – the average serving was 90g compared to the recommended portion of 30g. Which? also found that a Pizza Express supermarket pizza serves two but a pizza in a Pizza Express restaurant serves one; 41% of Which? members thought a 400g quiche was two portions, but it is actually four; and 63% felt a tube of Smarties was meant to serve one but it actually contains two servings (18).

We strongly recommend that portion sizes should be standardised across product categories by DHSC, similar to the list of Reference Amounts Customarily Consumed developed by the US Food and Drug Administration (19). Existing guidance on recommended portion sizes should be used in public awareness campaigns to educate the public on adequate portion sizes to maintain a healthy, balanced diet.

- **Reference Intakes and Thresholds**

We recommend the removal of reference intakes from FOPL. It is not clear to consumers that the reference intakes for fat, saturated fat, sugars and salt represent a maximum amount that they should try to stay within, not a target to aim for. Furthermore, just one in four (22%) working-aged adults are functionally numerate and may find percentage reference intakes confusing (20).

Currently, percentage RI is based on arbitrary portion sizes and does not take into account different intake requirements for men, women and children. The sugar RI is based on total sugars which does not align with SACN's own advice to limit sugars to less than 5% of daily energy intake (21). We also

recommend the removal of total fat from front of pack, given that saturated fat is displayed, and the only separate 'harm' associated with fat is from calories, which are included under 'energy'.

In recent years there has been poor progress towards voluntary salt and sugar reduction targets. Public Health England's ***Salt targets 2017: Second progress report*** highlighted that in 2018, retailers and manufacturers met 83% and 35% of their average salt targets respectively, and 83% of maximum targets were met by retailers and manufacturers combined (22). PHE's ***Sugar reduction: Report on progress between 2015 and 2019*** revealed that retailers and manufacturers had made an average 3% reduction in the sales weighted average total sugar per 100g in products sold between 2015 and 2019, compared to an expected overall reduction of 20% by 2020 (23). Therefore, we strongly recommend the lowering of current thresholds for red labels, for the beneficial impact on consumer choice, and to guide further reformulation.

- **Free Sugars**

We strongly support the replacement of total sugars with free sugars on the MTL FOPL and have explained the rationale for this in the 'Link to Dietary Advice' section of the consultation. However, it is worth noting here that the new Nutrient Profiling Model (NPM), which was consulted on in 2018, took into account free sugars in place of total sugars. Aligning the NPM and FOPL would help reduce confusion for industry.

Nutrient of Food Component	UK NPM 2004/5	Draft 2018 NPM
Energy	2130 kcal	2000 kcal
Total Sugars	21% of food energy	NA
Free Sugars	NA	5% of total dietary energy
Saturated Fat	11% of food energy	11% of food energy
Sodium	2.35g	NA
Salt	NA	6g
Fibre	24g AOAC (18g NSP)	30g AOAC (22.5g NSP)
Fruit and Vegetables	400g	400g
Protein	42g	42g

- **Back of Pack Information**

We strongly recommend the mandatory inclusion of fibre on the back of pack information panel, which we have detailed in the 'Link to Dietary Advice' section of the consultation.

We also recommend the mandatory inclusion of potassium on back of pack. This is currently a mandatory requirement for the US Nutrition Facts Panel, in recognition of low potassium intakes in US adults (24). In the UK, adults are recommended to eat 3500mg potassium per day, but current intakes are 2865mg/day, as measured by the NDNS rolling programme (25, 26). Increased potassium intake has been found to lower blood pressure in adults and there is moderate quality evidence to suggest that higher potassium intake is associated with a reduced risk of stroke (27). Highlighting potassium may increase awareness of the important of potassium in our diet, but it would also be beneficial for those who are required to follow a low-potassium diet, such as those with kidney disease. Furthermore, since the 2017 publication of the SACN/COT review, potassium-based sodium replacers have been deemed safe for use by food manufacturers. Salt reduction progress has been mixed, with many of the 2017 salt reduction targets being unmet. For product categories where salt reduction may be more challenging, such as processed meat, salt replacers could be used yet companies are reluctant to use them, in part due to consumer perception of potassium chloride as a 'chemical'. If potassium was mandatory on back of pack, it may encourage companies to utilise potassium salts.

Following the example set by Sainsbury's, we recommend that nutrition information printed on back of pack be colour-coded to mirror their front of pack labels.

Nutri-score Labels

We strongly recommend that if DHSC are proposing the implementation of this labelling system, they should conduct an impact analysis and specify how NutriScore would be more effective than MTL. It should be noted that NutriScore was developed to be culturally relevant to the region it was implemented within, and where there had not been a previous FOPL in its place. Furthermore, requesting the public's views on a labelling system they've only been given a paragraph of explanation of is too simplistic to produce meaningful data. High quality and real-life shopping research are required to test consumer understanding and use of labels.

Consumer Understanding

Any colour coded FOPL is beneficial for consumers. Results from a recent meta-analysis found colour coded FOPL labels led to an 18% increase in those consumers able to correctly identify the healthier option from a range of products, as well as a decrease in calories consumed by 4% (6). Results from our unpublished systematic review and meta-analysis (more information can be given if necessary) have revealed that all color-coded labels have a beneficial effect by encouraging the purchase of healthier products, preventing the selection of less healthy options and improving the overall nutritional quality of purchases, with no difference across label type.

Nutriscore is a relatively new colour coded FOPL, in use since 2017 in France with subsequent adoption by Spain and Belgium in 2018 and Germany in 2019. However, a strong body of evidence exists to support consumer understanding and use of NutriScore labels (28). Most of these studies have been conducted in France, involving researchers who helped develop the label, but a small number of studies have also taken place in Spain Italy, Switzerland, Germany, Netherlands, Portugal, Bulgaria and Morocco. To our knowledge, no high-quality studies have been conducted in the UK, specific to the UK population. Such an evidence review should be completed and publicised before we should be expected to form an opinion.

Calculation of NutriScore

NutriScore works in a similar way to the NPM - which would be of benefit to the food and drink industry as they regularly use NPM - giving foods an overall score of healthfulness from A to E, based on 'N' and 'P' scores:

- 'N' scores for nutrients we should be eating less of (energy, sugar, saturated fats, sodium)
- 'P' scores for nutrients we should be eating more of (fruit, vegetables, pulses, nuts, and rapeseed, walnut and olive oil, fibres, and proteins).

The total of 'P' scores is subtracted from the total of 'N' scores to give the overall score for the product. If the total 'N' score is above or equal to 11 points AND the total points for 'fruits, vegetables, pulses, nuts, and rapeseed, walnut and olive oils' is less than 5, then it cannot score any points for protein or fibre.

We do have concerns that in its current format, NutriScore has exceptions for dairy products where their score is calculated by taking protein into consideration, regardless of whether the N score is more than 11. This may go some way to explaining why companies such as Danone and Nestlé are

particularly supportive of the system, as it allows their portfolio of products to gain a 'healthier' FOPL compared to MTL (29).

NutriScore labels also appear to be more lenient for products with high protein or fibre contents, but with 'amber' or 'red' levels of salt, sugars and/or saturated fat:

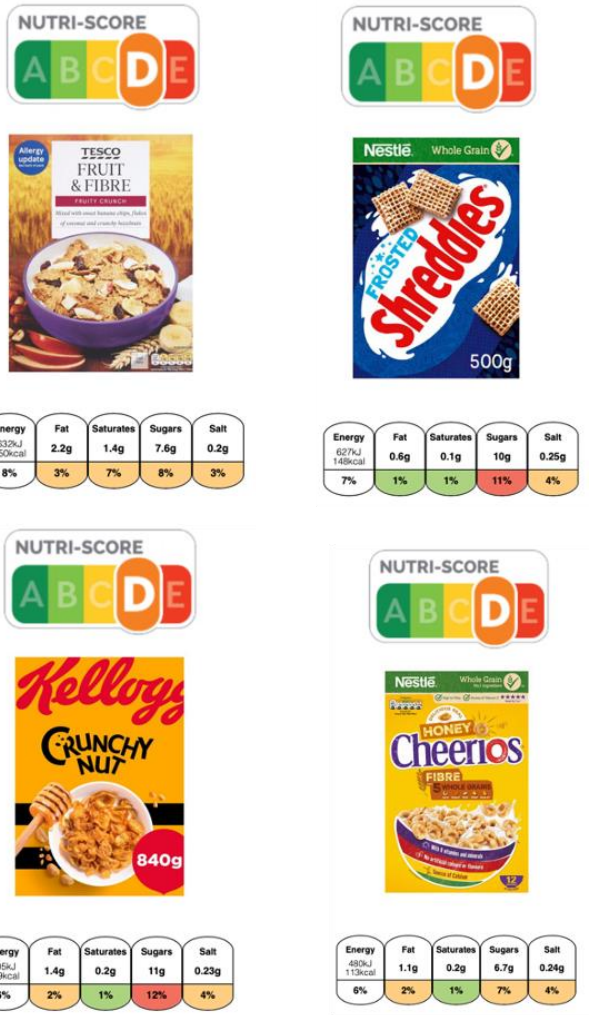
We also have concerns that it may be possible for companies to make small changes to recipes and 'gain' a healthier score compared to MTL which has wider thresholds. While we are supportive of reformulation, if a company makes a small change to, for example, saturated fat content to go up a score without changing the salt or sugars content, we would be concerned about consumer perception of this product.

Comparison Between Products

NutriScore lacks detailed information that MTL has on levels of individual nutrients. This makes it difficult to compare between similar products to find the healthier choice, as demonstrated by the following examples:

- Snack Products

- **Breakfast Cereals**



NutriScore Criteria

If NutriScore is considered for implementation in the UK, it should take into account free sugars as opposed to total sugars. We have explained the rationale for this in the 'Link to Dietary Advice' section of the consultation. However, it is worth noting here that the new Nutrient Profiling Model (NPM), which was consulted on in 2018, took into account free sugars in place of total sugars. Aligning the NPM and FOPL would help reduce confusion for industry.

Nutrient of Food Component	UK NPM 2004/5	Draft 2018 NPM
Energy	2130 kcal	2000 kcal
Total Sugars	21% of food energy	NA
Free Sugars	NA	5% of total dietary energy
Saturated Fat	11% of food energy	11% of food energy
Sodium	2.35g	NA
Salt	NA	6g
Fibre	24g AOAC (18g NSP)	30g AOAC (22.5g NSP)
Fruit and Vegetables	400g	400g
Protein	42g	42g

Nutrient Warning Labels

We strongly recommend that if DHSC are proposing the implementation of this labelling system, they should conduct an impact analysis and specify how this labelling system would be more effective than MTL. While the objective of the warning labels is to provide clear, simple and truthful information to the consumers about the content of ingredients that represent a health risk and are related to non-communicable diseases - sugars, fat and salt - it should be noted that the warning labels were developed to be culturally relevant to the region. Warning labels have had success in encouraging the food industry to reformulate their products to avoid displaying the labels; however much of this success could be attributed to the fact that they are mandatory.

Policy Landscape

Five countries have adopted the warning labels system as their mandatory front-of-pack label:

Table 1. Countries that have adopted warning labels and details of their implementation

Country	Date law was passed	Implementation date	Number of implementation phases	Government departments involved	Wording on labels
Chile	25th June 2015	26th June 2016	3	health, agriculture, economy, food security	"High in…"
Israel	26th December 2017	1st January 2020	2	health	"High in…"
Peru	17th June 2018	17th June 2019	2	health	"High in…"
Uruguay	31th August 2018	delayed until February 2021	2	health	"High in…"
Mexico	27th March 2020	1º October 2020	3	health and economy	"Excess"

Warning labels have been implemented in each country as part of a suite of policy measures, including:

- **restrictions on health and nutrition claims** – products with one or more warning labels are not permitted to display health or nutrition claims related to the labels e.g. if a product displays a 'high in sugar' warning label, the product cannot also display a '30% less sugar' nutrition claim
- **restrictions on marketing strategies targeted to children** – products displaying warning labels are not permitted to use cartoon characters or other animations designed to appeal to children
- **restrictions on inclusion in school menus** – only products without warning labels are permitted to be included in school menus

In addition, any marketing or advertising associated with a product that displays warning labels must also display the warning label e.g. it must be displayed in TV advertisements.

The success of warning labels was ensured by their implementation alongside other important restrictions. We are fully supportive of the concept of these restrictions and strongly recommend that similar restrictions be implemented in the UK e.g. products with one or more red front of pack labels must not be permitted to display health or nutrition claims.

Thresholds for Label Display

In comparison to thresholds set for red warning labels via MTL, thresholds for warning label display are stricter across all countries. In recent years there has been poor progress towards voluntary salt and sugar reduction targets. Public Health England's ***Salt targets 2017: Second progress report*** highlighted that in 2018, retailers and manufacturers met 83% and 35% of their average salt targets respectively, and 83% of maximum targets were met by retailers and manufacturers combined (22). PHE's ***Sugar reduction: Report on progress between 2015 and 2019*** revealed that retailers and manufacturers had made an average 3% reduction in the sales weighted average total sugar per 100g in products sold between 2015 and 2019, compared to an expected overall reduction of 20% by 2020 (23). Therefore, we strongly recommend the lowering of current thresholds for red labels for saturates and salt and reviewing total sugars in light of requirement to display free sugars, both for the beneficial impact on consumer choice and to guide further reformulation.

MTL Thresholds - Food Products

	LOW	MEDIUM	HIGH	
Colour Code	Green	Amber	Red	
			>25% RI	>30% RI
Fat	≤3.0g/100g	>3.0g/100g to ≤17.5g/100g	17.5g/100g	>21g/portion
Saturates	≤1.5g/100g	>1.5g to ≤5.0g/100g	>5.0g/100g	>6g/portion
(Total) Sugars	≤5.0g/100g	>5.0g to ≤22.5g/100g	>22.5g/100g	>27g/portion
Salt	≤0.3g/100g	>0.3g to ≤1.5g/100g	>1.5g/100g	>1.8g/100g

MTL Thresholds – Drinks

	LOW	MEDIUM	HIGH	
Colour Code	Green	Amber	Red	
			>25% RI	>30% RI
Fat	≤1.5g/100ml	>1.5g to ≤8.75g/100ml	>8.75g/100ml	>10.5g/portion
Saturates	≤0.75g/100ml	>0.75g to ≤2.5g/100ml	>2.5g/100ml	>3g/portion
(Total) Sugars	≤2.5g/100ml	>2.5g to ≤11.25g/100ml	>11.25g/100ml	>13.5g/portion
Salt	≤0.3g/100ml	>0.3g to ≤0.75g/100ml	>0.75g/100ml	>0.9g/portion

Chile Warning Label Thresholds

Companies Subject to the Law	Date	Products	Calories	Sugars	Saturated Fat	Salt
Large Food and Drink Companies	25/06/18	FOOD	300kcal/100g	15g/100g	5g/100g	1.25g/100g
		LIQUIDS	80kcal/100ml	5g/100ml	3g/100ml	0.25g/100ml
All Companies	27/06/19	FOOD	275kcal/100g	10g/100g	4g/100g	1g/100g
		LIQUIDS	70kcal/100ml	5g/100ml	3g/100ml	0.25g/100ml

Israel Warning Label Thresholds

Companies Subject to the Law	Date	Products	Sugar	Saturated fat	Salt
Large Food and Drink Companies	01/01/20	FOOD	13.5g/100g	5g/100g	1.25g/100g
		LIQUIDS	10g/100ml	4g/100g	1g/100ml
	01/01/21	FOOD	5g/100g	3g/100g	1g/100g

		LIQUIDS	5g/100ml	3g/100g	0.75g/100ml

High Sugar Level High Sodium Level High Saturated Fat Level

Peru Warning Label Thresholds

Companies Subject to Law	Date	Products	Sugars	Saturated Fat	Trans Fat	Salt
Large Food and Drink Companies	17/09/22	FOOD	10g/100g	4g/100g	500mg/ 100g	≥1g/100g
		LIQUIDS	5g/100ml	3g/100ml	100mg/ 100ml	0.25g/100ml

Other specifications - the saturated fat, sugar and sodium warning labels have the following disclaimer: **Avoid excessive consumption**. The trans-fat warning label has the disclaimer: **Avoid consumption**.

Uruguay's thresholds for their warning labels

Companies Subject to the Law	Date	Products	Sugar	Fat	Saturated fat	Salt
Large Food and Drink Companies	01/07/20 (delayed)	Food & Beverages	≥20% of total energy from free sugars, or 3g/100g	≥35% of total energy	≥12% of total energy from saturated fat	0.02g/1kcal or 1.25g/100g
	TBD	Food & Beverages	≥10% of total energy	≥30% of total energy	≥10% of total energy	0.003g/1kcal or 0.9g/100g and zero-calorie beverages 0.25g/100ml

Mexico Warning Label Thresholds

Companies Subject to the Law	Date	Product	Calories	Sugars	Saturated fat	Trans fat	Salt	Sweeteners and Caffeine
ALL FOOD INDUSTRY	01/10/20	FOOD	275kcal/100g	≥10% of total energy from free sugars	≥10% of total energy from saturated fat	≥1% of total energy from trans fat	≥0.88g/ 100g	Added
		LIQUIDS	≥70kcal/100ml or ≥10% of total energy from free sugars	≥10% of total energy from free sugars	≥10% of total energy from saturated fat	≥1% of total energy from trans fat	≥0.88g/ 100ml zero calories beverages ≥0.19g /100ml	Added

	01/10/23	FOOD	275kcal/100g	≥10% of total energy from free sugars	10% of total energy from saturated fat	≥1% of total energy from trans fat	≥0.003g/ kcal or ≥0.75g/100g	Added
		LIQUIDS	≥70kcal/100ml or 8kcal from free sugars	≥10% of total energy from free sugars	10% of total energy from saturated fat	≥1% of total energy from trans fat	≥0.003g/ kcal or ≥0.75g/ 100ml Zero calories beverages ≥0.11g/ 100ml	Added

Other specifications

All food and beverages with a small front-of-pack space must display a label which indicates the **number** of warning labels it would have to display if space were available i.e. a chocolate bar high in sugar and calories must show a warning label with the number **"2".**

The following examples show what products would look like with warning labels displayed. While we support less healthy products being highlighted clearly to consumers, and we anticipate that if warning labels were introduced then companies would reformulate to avoid having to display the labels, we recommend that familiarity with the current MTL system be taken into account. The current MTL system must be made mandatory across all products, including products such as confectionery or sweet spreads which currently are less likely to display MTL.

Industry Push Back

While many companies have expressed support for different labelling systems (e.g. BRC members are generally supportive of MTL; Nestle, Danone and Unilever have expressed support for NutriScore due to the product categories in their portfolios), industry pushback to the implementation of warning labels has been excessive. World Cancer Research Fund International have classified the industry tactics of interference as the '4Ds': Delay, Divide, Deflect, Deny (5).

- Delay

In Mexico, the food industry asked for a delay in the meetings during consultation periods in 2019. Jaime Zabludovsky, president of lobby group "ConMexico" which represents food and beverage companies such as Coca-Cola Co, PepsiCo Inc, Nestle and Mexican bread maker Grupo Bimbo, recently said the labels would confuse the public and asked for a delay of the implementation.

In November 2019 the CEO of Nestlé sent a letter urging its suppliers to mobilize against the labels and sent letters to government officials to "intervene" in the process. Hershey's also asked for a delay in implementation, but its request was not approved.

In Peru, the warning label was approved by law makers in 2013 but it took four years for the labels to become implemented in 2017.

- Divide

Food and beverage companies heavily promoted the existing GDA label in Mexico as the 'best' labelling scheme and produced several press releases, stating that implementation of the warning labels would trigger an economic crisis, leading to job losses. Industry put a significant amount of resources towards lobbying, gaining the support of several policy makers and stakeholders.

- Deflect

The food and beverage industry in Mexico tried to build a case that the thresholds proposed were too strict and that all products would have to display the warning labels, using the example that milk would have to display the same warning labels as soda (this was not true).

- Deny

Several companies across the region said that they were not invited to consultation meetings on the implementation of the labels, despite there being meeting minutes signed by them. Companies also stated that there was not enough evidence to implement the warning labels.

DHSC must be prepared for manufacturer push-back and engage them in the need for a mandatory system.

Impact on Reformulation

Salt and sugar reformulation in processed foods and drinks can occur rapidly, especially when targets and thresholds are sufficiently challenging. This has been clearly demonstrated in Chile, where the proportion of products that would have been unfavourably labelled, due to their high salt or sugar content, has decreased significantly, and also swiftly (i.e. in less than a year). A cross-sectional analysis (2015-2016 vs 2017) found that the proportion of products with any warning labels fell from 51% to 44% (30). The most frequent reductions were in the "high in sugar" label, particularly in sugar-sweetened beverages, milks and milk-based drinks, breakfast cereals, sweet baked products, and sweet and savoury spreads. The "high in sodium" label was also displayed on average 74% less, due to reformulation of savoury spreads, cheeses, ready-to-eat meals, soups, and sausages.

Alternative Labelling Systems

A total of 31 countries have implemented interpretive FOPL systems, including 6 countries that have adopted mandatory warning labels on packaged foods and 3 countries that utilise mandatory colour coded FoPLs (31). We strongly recommend that DHSC conduct an impact analysis of the MTL system currently in place in the UK and consider making this system mandatory to assess any further impact

on consumer understanding and use of labels, as well as reformulation and health outcomes, prior to selecting alternative systems. DHSC must also commission research based on real-life purchasing behaviour, not simulated models, to determine the labelling system most preferred by UK consumers. Any impact analysis must utilise a standardised definition of healthy e.g. the NPM.

It is worth stating that while NutriScore is seen as the 'European label', in Italy a competing label – NutrInform - has been proposed. In addition, the Czech Republic, Cyprus, Greece, Hungary, Latvia and Romania object to the roll out of NutriScore across the continent (32).

Link to Dietary Advice – Sugar

- The amount of free sugar in grams should be clearly stated on front of pack per serving
- We recommend that traffic light labelling should be mandatory on all packaged food and drink, therefore further consideration needs to be placed on the inclusion of infant foods and foods directly marketed for children, due to the percentage of daily intake guidance being based on an adult, or an older child in the case of free sugars
- Free sugars, including added sugar, should also be reflected on back of pack, in the nutrition information panel
- If used, the quantity of sweetener/sugar replacer should be represented in the nutrition information

Free sugars are not an essential part of the diet. According to Public Health England's definition, everything from processed fruit snacks to fruit juice contain free sugars. Many pre-packaged processed food and drink are high in free sugars, salt and saturated fats (HFSS). These nutrients of concern are linked to an increased risk of overweight, obesity and diet related NCDs. Consuming excess free sugars from food and drink can lead to weight gain, which in turn increases the risk of heart disease, type 2 diabetes, stroke, some cancers as well as tooth decay. There is a consistent association between sugar intake and dental caries. Minimising sugar intake to less than 5% of total energy intake would help reduce the risk of dental caries throughout the life course (33).

Consumer insights research, conducted for the Department of Health and Social Care by Kantar, found that sugar was seen as the most important information on the label (34). This is understandable due to the focus and attention rightly given to free sugar intakes in the UK. In the UK we eat approximately double the recommended 5% of total energy intake from free sugars (21). Public Health England (PHE) in their evidence to action, published in 2015, clearly demonstrated how reducing free sugar intake to 5% of total energy intake could make a drastic difference to health outcomes and result in major cost savings to the NHS (34).

The latest figures from the National Diet and Nutrition Survey shows that the proportion of the population meeting the recommendation of no more than 5% of daily total energy intake from free sugars, was only 13% for children aged 1.5 to 3 years, 2% of children aged 4 to 10 years and 5% of children 11 to 18 years. Only 13% of adults aged 19 and above met the recommendation (35).
One of the reasons for high sugar intakes in the UK is the food environment saturated with unhealthy products high in fat, sugar, salt and calories. According to research by Share Action, in total, over two thirds of packaged food and drink products in the UK are unhealthy. The UK food and drink manufacturing sector is worth £105 billion and is highly concentrated, with just a handful of companies making the majority of HFSS products (36).

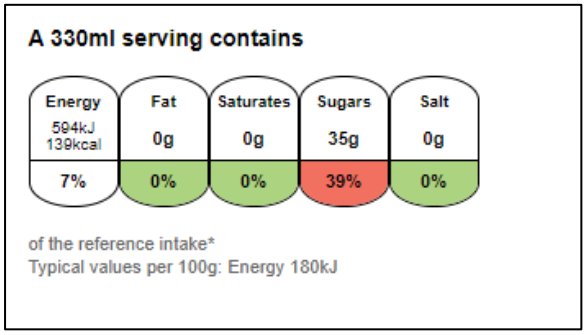
There are many tactics used by manufacturers that disguise the true free sugar content of products. To avoid 'sugar' being the first ingredient listed in the ingredients list, companies use an array of types of sugar in the recipe. This can be demonstrated by reviewing the below product:

- '**Cadbury Brunch Bar**' (37) containing five different types of sugar **(bold)** and three types of sugar containing ingredients (underlined)
    - Ingredients: Oat Flakes (25 %), **Sugar, Glucose Syrup,** Stabiliser (Sorbitol), Vegetable Fats (Palm, Shea), Wheat Flour, **Invert Sugar Syrup,** Rice Flour, Cocoa Butter, Cocoa Mass, **Honey (2 %),** Skimmed Milk Powder, Wheat Bran, Whey Powder (from Milk), Whole Milk Powder, Humectant (Glycerol), Milk Fat, Barley Malt Extract, Salt, Emulsifiers (Soya Lecithins, E471, E476), **Molasses,** Flavourings

Many shoppers understand that the first ingredient is the largest and in this case oats which would give an 'at a glance' impression of a healthy product. However, oats make up 25% of the product. 25% of 32g is 8g of oat flakes and there is 8.8g of sugar, so sugar is the largest ingredient in this case. Consumers need to know 'at a glance' the true free sugars content to avoid this blatant manipulation of product development.

Sugar labelling is misleading and confusing due to the reference intake for sugar being 90g of total sugars. For example, on the Tesco website under 'Kids Fruit & Nut Snacks' 'Tesco Yogurt Coated Strawberry Fruit Bites 125g' (38) display a MTL label declaring that each portion has 15.5g sugar equating to 17% of the reference intake (RI). The sugar in this product comes from sugar, fructose syrup, fruit juices and purees which are all defined as free sugars. 15.5g free sugars is in fact, 82% of the maximum recommended daily amount for a 4-6-year-old (19g), 65% of the recommended amount for 7-10-year olds (24g) and 52% of the recommended amount for anyone over 11 years (30g).

Traffic light label for Coca-Cola:



This is the current traffic light a can of Coca Cola (39) would display. If the sugars lozenge had to reflect free sugars content, it would have to state that it contains 117% of the daily recommended intake of free sugars for those ages 11 or over. In addition, current references for recommended intakes are based on an adult's requirements and consideration needs to be placed on how this should be reflected, especially on products aimed at children. As stated earlier in our response, we recommend the removal of reference intakes from FOPL.

Nutrition and health claims

The EU Register of nutrition and health claims (40) made on foods permit the following claims in relation to sugars.

- Low sugars
- Sugars-free
- With no added sugar

    - to include If sugars are naturally present in the food, the following indication should also appear on the label: ‘contains naturally occurring sugars’
- Reduced sugar (at least 30 % less sugar compared to a similar product)
- Naturally/Natural
    - Where a food naturally meets the condition(s) laid down in this Annex for the use of a nutritional claim, the term ‘naturally/natural’ may be used as a prefix to the claim e.g. Naturally low sugar

Any change of labelling must take into the consideration the use of these claims and their potential to mislead or undermine clearer labelling on free sugars e.g. Foods can be labelled ‘no added sugar’ and include ‘naturally occurring sugars’ even though they contain free sugars from fruit juice, purée or paste. Other examples of these practises can be seen on the marketing of these products on television and online. Furthermore, when consumers see health and nutrition claims printed on pack, that may not then look at other nutrition content information, under the assumption that the claim on pack means the product is ‘healthy’.

The Advertising Standards Authority ruled that a claim of "only one gram of fat" was likely to suggest to viewers that a Jaffa Cake was low in fat, and so was in fact a “low fat” claim . In order to bear a “low fat” claim, foods may have no more than 3 g of fat per 100 g whereas Jaffa Cakes contained 8 g of fat per 100 g. Similarly an advert for Maltesers, which contain 505 calories per 100 g, was found to breach the rules because it claimed “less than 11 calories each” which was likely to suggest that a Malteser was low in calories; which would be equivalent to a “low energy” claim, for this claim the product should have no more than 40 kcal per 100 g (41).

Marketing claims

In addition to the EU approved claims there is a number of claims that are merely marketing terms used by food manufacturers. During the launch of the National Food Strategy Henry Dimbleby described such claims on packaging as 'wilfully misleading'as he described Marks & Spencer’s Percy Pigs which claim: “Made with real fruit juice,” but the first three ingredients are glucose syrup, sugar and glucose-fructose syrup (42).

Many products use marketing terms that are confusing and take advantage of current labelling legislation. Claims and statements such as ‘1 of your 5 a day’ ‘made with real fruit’ regularly appear on HFSS products. Processed dried fruit products are marketed as healthy snacks due to their high fruit content, however, the sugar in these products are free sugars as they contain purees, concentrates and juices. ‘The Fruit Factory Multi Fruit Strings’ state ‘Made with Fruit’ on the front of packaging, despite containing glucose syrup, sugar and fructose syrup along with concentrated fruit juice (43).

We also strongly recommend a ban on marketing tactics designed to appeal to children, especially the use of cartoon characters. Our recent survey revealed that half (52%) of 526 food and drink products which use cartoon characters on pack are high in fat, salt and/or sugars. Manufacturers and retailers must not be allowed to deliberately manipulate children and parents into purchasing unhealthy products via pester power, which encourages excessive consumption (44).

Back of pack update:

In addition to changes on front of pack, sugar should be represented more clearly on the back of pack i.e. nutrition information panel. ‘Added sugars’ or ‘free sugars’ are not currently labelled in addition to ‘total sugars’ on food and drink in the UK. Free sugars should be clearly labelled on food

and drink packaging in order to help everyone to make informed choices and to bring MTL in line with the updated NPM. This will also help raise awareness in the population of the need to reduce free sugars, which are present in many food and drink products that we tend to think of as healthy, for example unsweetened fruit juice.

There have been successful examples of this internationally both voluntary and mandatory. In 2018, Dutch supermarket Albert Heijn, developed a new back of pack nutrition deck to reflect consumer demand for clear information on sugars. Their own customer research made it clear that shoppers would prefer to have all the information available to them at point of choice. Own brand labels now display which proportion of sugar and salt is added by the manufacturer and not just the total amount (45).

In May 2016, the US Food and Drug Administration announced that labelling of added sugar content on all packaged food and beverages would become mandatory (46). A delay to the implementation deadline means this will not come into force until 2020, although some companies have already rolled it out. They do not currently have a front of pack scheme. Modelling studies have predicted that between 2018 and 2037, the labelling of added sugar would save $31 billion in healthcare costs or $61.9 billion societal costs while reducing median added sugar intake by an additional 2.1 g/day. The addition of reformulation by manufacturers alongside labelling changes predicted a reduction of 4.8 g/day median added sugar intake (47). Alongside these changes they launched a public health information campaign, and this is an essential factor to ensure understanding by customers. We strongly recommend that DHSC and the Department of Education develop similar education programmes, related to FOPL.

Sweeteners/Sugar Replacers

Under European law, sugar replacers must be included in the ingredients list on product packaging declaring its function (e.g. sweetener) and its name (e.g. Aspartame) or its E number (e.g. E951). Sweeteners are classed as food additives, and therefore their intake is considered under the scope of Acceptable Daily Intake (ADI) values (48). Action on Sugar recommend that both sugar and sweeteners should be reduced in products across the board. It is essential that the quantity of sweetener be clearly stated to ensure adequate monitoring of the sugar and sweetener content of processed foods. In line with advice from partner organisations, we do not believe that sugar replacers should be consumed by children.

In Sweden, the use of sweeteners is not allowed in products bearing the Keyhole logo (49). This logo is permitted on products, based on a nutrient profile model, and aims to identify healthier packaged food choices within a food category, and to stimulate food manufacturers to reformulate and develop healthier products. As mentioned elsewhere in this consultation, a warning label is required on products containing sweeteners in Mexico, to highlight the unsuitability of that product for children.

As consumer desire for low sugar options increases, the use of sweeteners and sugar alternatives is increasing (50). Manufacturers are exploring new ‘clean label’ sweeteners and so called ‘natural’ sweeteners. As part of any proposed changes to labelling in the UK there is an opportunity to add sweeteners to the nutrition information. If these products continue to be classed as an ‘additive’ then consumers could be mislead by labelling of sweeteners as they are currently for free sugar.

Link to Dietary Advice – Fibre

- Fibre content should be **mandatory on back of pack** in the nutrition information.

- Accompanied by a public information campaign to ensure understanding and to avoid unintended consequences

Since the publication of the Carbohydrates and Health report and the new recommendations on free sugars made by the Scientific Advisory Committee on Nutrition (SACN), sugar has dominated the media headlines. Yet in the same report in which the sugars recommendations were made, new recommendations were also made for dietary fibre following a review of the evidence around fibre and health. Whilst sugar remains a hot topic, it's important that fibre isn't overlooked.

Fibre has multiple benefits to health. Studies show that higher fibre intakes are associated with a lower risk of cardiovascular disease (CVD), type 2 diabetes and colorectal cancer. Fibre is beneficial to gut health because it decreases intestinal transit time (meaning waste travels through the digestive tract more quickly) and increases faecal mass, thereby helping to prevent constipation. Evidence shows that oat bran and beta glucans can help to reduce blood cholesterol. Because the evidence for the wide-ranging health benefits of fibre comes from studies where fibre is consumed from a variety of foods where it is present as a natural component, SACN recommends that fibre intakes should be achieved through a variety of food sources, such as wholegrain breads and cereals, brown rice, beans and pulses, fruits and vegetables, oats, nuts and seeds. With this in mind it is important to avoid over labelling processed foods with fibre claims as this is misleading.

Current intakes are much lower than the recommendations across all age groups in the population, and so knowing which foods provide fibre is important to help people increase their intakes. Following a healthy, balanced diet, consuming at least 5 portions of fruits and vegetables every day and choosing wholegrain foods will help people to meet the recommendations of fibre.

Age Range	Recommended Daily Fibre Intake	Current Daily Fibre Intake
2-5-year olds	15g	10.3g
5-11-year olds	20g	14g
11-16-year olds	25g	15.3g
19-64-year olds	30g	19g
65+ year olds	30g	17.5g

Nutrition and Health Claims

As mentioned above for sugar, consideration needs to be placed on the future of nutrition and health claims enshrined in EU law. Current fibre claims are protected by the requirement that a product claiming to be a 'source' of fibre should contain at least 3g of fibre per 100g or at least 1.5g of fibre per 100 kcal. A product claiming to be 'high fibre' should contain at least 6g of fibre per 100g or at least 3g of fibre per 100 kcal (51). Additionally, products that currently claim 'High in Fibre' legally can also contain added sugar. Nestle Multigrain Cheerios state on front of pack the following claims:

- Wholegrain
- High in Fibre
- Source of vitamin D
- FIBRE
- 5 whole grains
- With 9 vitamins and minerals
- No artificial colours or flavours

- Source of calcium

This product contains 5g sugar per 30g portion. Recent polling by Which? found that portion size guidance is poorly represented on packaging (52). All 122 participants in their study served themselves a 'usual' bowl of their cereal and reported the dry weight of their serving, the portion size that's recommended on the packaging and the type of cereal they were eating. Results showed volunteers served themselves, on average, 63% more than the recommended portion. For Cherrios specifically, they found the average portion served was 49g which would contain 8.8g sugar per portion. This comes at a time when Breakfast Cereals UK (BCUK), the UK trade body for breakfast cereal manufacturers sets out a case for the apparent nutritional importance of breakfast cereals as contributors of fibre and micronutrients (53). A breakfast cereal high in sugar, regardless of its fibre content, is not a healthy breakfast choice. In our recent breakfast cereal survey, just 6 out of the 56 breakfast cereals with packaging that appeals to children surveyed were low in sugar and high in fibre, and only three were also low in saturated fat and salt (54).

We do agree that highlighting fibre content is important, and ideally this could be done on front of pack. This would likely not be possible with MTL, as red is used to signify high levels of a nutrient; however, a product that is high in fibre should have a green label instead to highlight the positive. A tick or other 'healthy' logo could be applied to product packaging if that product is high in fibre but use of the logo would need to be policed to ensure that the logo is not applied to products that are also high in salt, saturated fat or free sugars. Should DHSC proceed with highlighting fibre content on front of pack, we recommend they release a further consultation with examples to determine the format.

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