

Consultation response

Building on the success of front of pack nutrition labelling in the UK

Summary

Which? welcomes this opportunity to respond to the UK-wide consultation on how to build on the success of front of pack nutrition labelling. Front of pack nutrition labelling is a crucial tool in helping consumers to make more informed food choices.

- Our consumer research supports the continued use of the multiple traffic light (MTL) nutrition label on front of pack.
- Other schemes have been launched internationally, but these have been developed according to their specific national context. Our most recent survey found that most people still preferred the MTL label, compared to the Nutri-Score or Chilean warning label (or a 'hybrid' of the MTL and Nutri-Score).
- There is scope to improve the MTL label to ensure that it is as clear, easy to use and impactful as possible. There should be more consistent presentation by manufacturers and retailers, including more consistent use of portion sizes. Our consumer research also indicates that people would welcome the inclusion of information on free sugars on the pack.
- To be effective and enable truly informed choices, the same front of pack nutrition labelling scheme needs to be used across all brands. The government should use the flexibility to legislate after the end of the transition period to make the MTL scheme mandatory.

Introduction

Which? welcomes this UK-wide consultation on how to build on the success of front of pack nutrition labelling. We are submitting a written response as the online questionnaire was directed mainly at individual consumers and we would like to refer to the wider nationally representative consumer research we have conducted about front of pack nutrition labelling.

People need clear information about the nutritional quality of foods so that they can make informed choices and assess how individual products fit with government's healthy eating advice. Our research comparing different food products from breakfast cereals to ready meals has regularly shown how products can contain surprising amounts of saturated fat, sugar and salt. Which? has therefore strongly supported simplified nutrition information on the front of



pack as part of a range of measures to make it easier to eat healthily – and ultimately help people to lead healthier lives.

Our earlier consumer research, both qualitative and quantitative, as well as that conducted by other authoritative bodies, such as the Food Standards Agency, supported the use of traffic light colour coding to show whether products are high, medium or low in key nutrients. Traffic light labelling can also help to incentivise manufacturers to reduce the fat, sugar and salt levels in their products.

We agree that seven years on since the government recommended the use of the MTL label, it is an important time to review front of pack nutrition labelling, particularly with changing shopping habits and the potential ability of the UK to mandate a labelling scheme after the end of the transition period after leaving the EU.

Relevant consultation questions

We have adapted the questions to apply to consumers in general, rather than responding from an individual perspective and focused on those of most relevance to Which?.

1. Multiple traffic light label for the public

- **Do [people] use the MTL label to make choices about the food and drinks that they buy? Do [they] find the MTL label (a) clear and (b) informative?**

The most recent survey¹ conducted by Which?, representative of the UK population, which asked people about front of pack nutrition labelling found that awareness of the MTL scheme was high (89% of respondents). The same proportion of people thought that the scheme was helpful (89%). Our wider consumer research on food issues has also supported this, with people referring to the traffic light labelling scheme positively.

- **How easy do [they] find the following components of the MTL label? (a) individual nutrients (fat, saturates, sugar, salt) (b) use of red, amber and green colours (c) reference intakes (d) portion size**

The same survey found that overall, the colour coding was the aspect that the largest proportion of consumers find helpful (91%), with over half saying that this was very helpful (56%).

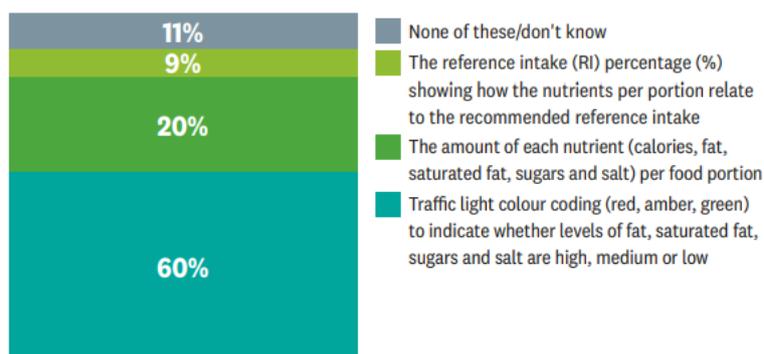
A majority also thought that the amount of nutrient per portion (87%) was helpful, with 43% saying that it was very helpful. 78% said that the percentage of the reference intake (% RI) information was helpful, with 33% saying that it was very helpful.

¹ Populus, on behalf of Which?, conducted a survey to understand consumers' attitudes to food labelling and the traffic light system. A sample of 2385 over 18s in the UK were interviewed online between 10th - 11th December 2018. The data was weighted by gender and age to be representative within the UK.



Colour coding was also the aspect the largest proportion of consumers thought was important (89%), with over half thinking this is very important (52%). The following chart shows the relative importance of the different elements.

Importance of the different parts of the MTL label



- **How could the MTL label be made easier to use?**

Although there is guidance on how the MTL label should be presented, there is flexibility for presentation. This is appropriate to a certain extent, but more consistent and, in particular, more prominent and consistent presentation of the scheme could make it easier to use. Our research found that 4 in 5 (80%) thought traffic light labelling should look the same on all food products.

As part of this review, there is also scope to take another look at the elements of the scheme to make sure that the scheme is most useful for all consumers to use. This should include additional consumer testing of the performance of the elements of the scheme and how the label can have the most impact on people's decisions and choices.

The use of more consistent and realistic portion sizes is also one area where we think the scheme can be improved. A recent report in Which? magazine² found, for example, that there is a lot of variation in portion sizes used by manufacturers. This will affect how the MTL scheme is applied, sometimes making products appear healthier than is really the case. We looked at almost 40 food products and repeatedly found conflicting portion size guidance on the packaging – sometimes even within the same product.

- **Would [people] find it helpful if more products displayed the same front of pack nutrition label?**

Although there has been wide take up of the MTL scheme, it is still not used by all manufacturers and retailers. Those that do use it do not always show it on all relevant products. Our research found that more than 4 in 5 (85%) would support all manufacturers (including own-brands) being required to put traffic light labelling on their food products. The

² <https://press.which.co.uk/whichpressreleases/which-calls-for-standardised-labelling-as-it-uncovers-baffling-portion-sizes-on-popular-foods/>



government should make the scheme mandatory after the end of the transition period after EU exit.

2. New international examples

- **Do you think [people] would be likely to use one of these labels more when shopping compared to the MTL label? If yes, which label would they be more likely to use (a) Chile (b) Nutri-score. What aspects of the Nutri-score label do you like/dislike? What aspect of the Chilean health warning label do you like/dislike? Are there any other front of pack nutrition labels that you think government should consider?**

The Nutri-Score scheme and Chilean warning label have been developed in specific national contexts. We work closely with our sister consumer organisations around the world – and these schemes are preferred in the countries that have adopted them. It is, however, important to ensure that the UK adopts the best scheme for our context, including the way that people shop, make decisions about food and our public health priorities.

Our research to date, suggests that people in the UK prefer a breakdown of key nutrients, rather than an overall score or rating. This was certainly the case when we conducted our original testing as part of our campaigning work for a multiple traffic light labelling scheme. Part of the value of a front of pack labelling scheme is the impact that it has as consumers are shopping. However, our understanding is that people prefer schemes that help identify products that are healthier, as well as less healthy. Both the Nutri-Score and the Chilean scheme therefore have limitations in this respect.

Our December 2018 survey asked people for their views on these two schemes. When shown the MTL label, the Nutri-Score label and a label that combined both of these: 60% said that they would prefer to see the MTL label on front of pack, 10% said that they would prefer to see the Nutri-Score and 31% said they would prefer the combined label. This was consistent across socio-economic groups. 59% of people in socio-economic group AB said they preferred the MTL label, compared to 9% who said they preferred Nutri-Score and 32% who preferred a combination of the two schemes. 57% of people in socio-economic group DE preferred the MTL, compared to 10% who preferred the Nutri-Score and 33% a combination of the two.

When asked about preference for the UK scheme compared to the Chilean scheme, 81% said they would prefer to see the MTL label, 8% said they would prefer the Chilean label and 11% said that they had no preference.

This therefore supports the continued use of the MTL label, while looking for opportunities to make it more prominent and consistent across different brands and products.



3. Link to dietary advice

- **Do you think the Government should ensure that the recommended front of pack nutrition label reflects latest advice on free sugar? Do you think the Government should ensure that the front of pack nutrition label reflects the latest dietary advice on fibre?**

Front of pack nutrition label needs to be simple, but also relevant for consumers and current public health priorities. It is important that the nutrients that are included in the label, or through additional means on the label, reflect current dietary advice and nutritional priorities. The nutrients that are included should therefore be kept under review. We think that there is a strong case for inclusion of free sugars on the label – either on front or back of pack.

Our research found that 4 in 5 people (84%) wanted to see extra information on sugar, breaking down the proportion that occurs naturally and the proportion which has been added (ie free sugars) included. Around a third (34%) said that they didn't mind where this was provided. The same proportion (34%) said that they would like to see it provided on the front of pack. 16% said that they would like to see it on the back, with 16% saying that they did not want additional information.

We have not asked people about dietary fibre. Any decision to require its inclusion should take account of its nutritional importance as well as how this affects consumers' use of the label. This should take account of people's preferences, as well as independent testing of understanding and influence of labelling formats.

**Which?
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Sue Davies, Head of Consumer Protection and Food Policy, Which?, 2 Marylebone Road, London, NW1 4DF, sue.davies@which.co.uk.