August 2008


Who we are: Cancer Research UK\(^1\) is the world’s largest independent organisation dedicated to cancer research, with a research spend of over £315 million in 2006/07. Our vision is that together we will beat cancer. We carry out world-class research to improve our understanding of cancer and to find out how to prevent, diagnose and treat different types of the disease.

After smoking, keeping to a healthy bodyweight is one of the best ways to reduce the risk of cancer. Researchers have estimated that a third of all cancers are caused by poor diet, alcohol consumption and obesity.\(^2\)\(^3\)\(^4\) We therefore welcome initiatives which enable people to make healthy dietary choices more easily.

General comments: Cancer Research UK welcomes the European Commission’s proposal to improve food labelling and nutritional information for consumers. We believe that clear and consistent food labelling is one important strand of a comprehensive strategy to tackle increasing rates of obesity.

Research suggests that food labelling can have an impact on dietary choices and that consumers do use food labels and find them useful when making food choices (especially when buying products for the first time).\(^5\) Research also shows that consumers want simpler, clearer food labelling and labelling schemes that recognise inequalities in numeracy and literacy.\(^6\)

SUMMARY OF OUR POSITION:

- We support the introduction of a mandatory EU-wide traffic light labelling system, on the front of pack.
- If an EU-wide mandatory traffic light labelling scheme is not included in the final Regulation, Member States should be free to continue to develop and publicise their own schemes.
- If Guideline Daily Amounts are to be used (for example, to complement a traffic light scheme, on the back of pack), the values should be independently developed and evaluated.
- We support mandatory front of pack labelling for energy, fat, saturated fat, NME sugars and salt.

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\(^1\) Registered charity no. 1089464


\(^4\) Willett, W. Diet, nutrition and avoidable cancer. Environ Health Perspect 103 Suppl 8, 165-70.


We support mandatory back of pack labelling for protein, energy, fat, saturated fat, carbohydrates, sugars, salt and fibre.

**MANDATORY NUTRITION DECLARATION- ARTICLE 29**

Commission Proposal: mandatory front of pack labelling for 5 main nutrients: energy, carbohydrates with specific reference to sugars, fat, saturates and salt.

*Our view:* We support mandatory front of pack labelling for:

- Energy
- NME* sugars
- Fat
- Salt
- Saturates

We do not support the inclusion of carbohydrates on the front of pack. This is because the carbohydrate value is a target to reach on a daily basis, rather than a maximum intake value. We believe it can be confusing for consumers if the values on the front of pack represent a mixture of maximum values and recommended daily amounts.

In addition, on the back of pack we support a mandatory declaration of the full 8 nutrients:

- Energy
- Carbohydrates
- Protein
- Sugars
- Fat
- Salt
- Saturated fat
- Fibre

**FORM OF EXPRESSION OF THE NUTRITION INFORMATION (GDAs)- ARTICLES 31 (2), 31(3)AND 34 (1)**

Commission proposal: Mandatory nutrition information shall be expressed as a percentage of the reference intakes, also known as Guideline Daily Amounts (GDAs), set out in Part B of Annex XI in relation to per 100g or per 100ml or per portion. Voluntary information to be set out in numerical form as in Part C of Annex XIII.

*Our View:* We believe the labelling system must offer consumers a simple, clear, visual message, so that it is understood and used by as many people as possible. Time pressured shoppers spend as little as **four seconds on each purchase**7, so it is vital that nutritional information is available ‘at-a-glance’. The overriding consideration in deciding which model is most appropriate should be its capacity to help people change their eating habits for the better.

We do not believe that the GDA percentage scheme is the most effective way to achieve this because:

a) Research has shown that consumers find it more difficult to accurately assess the nutritional value of products than when using the colour-coded traffic light labelling scheme. If food labelling is to be of value it must aid the consumer in making accurate nutritional choices, quickly and easily.

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* Non-milk extrinsic (NME) sugars are types of sugars which include the sugar we buy in shops and the sugars that are added to some foods and drinks. NME sugars are also found in fruit juice. Too much of NME sugars should be avoided because, unlike intrinsic sugars, found naturally in foods such as whole fruit, vegetables and milk, they can cause tooth decay.

b) Research by the Dutch consumer organisation, Consumentenbond, has found that many consumers are often confused by GDAs and see them as a target to aim for, rather than as a recommended maximum daily amount.

c) The GDA values proposed by the Commission have been developed by the food industry, the UK’s Institute of Grocery Distribution, rather than by an independent body.

Instead, we believe that a colour coded system, using traffic light colours, should be mandatory for front of pack information about the levels of fat, saturated fat, NME sugars and salt.

A colour coded or signpost labelling scheme would meet the aims of the proposed Regulation as:

- Published research from the UK has shown that consumers are able to interpret nutritional labels with traffic light colour coding more easily and at a glance than labels without colour coding. 

- The evidence, from the UK, Australia and New Zealand, shows that a traffic light labelling scheme encourages the food industry to alter the nutritional value of products and reformulate in order to achieve a desired symbol and colour.

- Such a scheme helps consumers to evaluate the nutritional value of ‘main meal’ products in particular complex or processed foods.

- A signpost labelling scheme can serve as a useful reference system by which a wide range of organisations can promote a healthy diet and offer more concrete lifestyle advice. This allows the same, consistent message to be given with confidence, and should enhance efforts to promote a healthy diet to reduce the risks of cancer and other diseases.

A GDA system should only be considered if the reference intake values are independently developed and reviewed and they are combined with a multiple colour coding scheme.

THE UK EXPERIENCE: THE TRAFFIC LIGHT LABELLING SYSTEM:

- It provides easy to understand information which quickly tells the consumer whether the food product is high (red), medium (amber) or low (green) in fat, sugar and salt and helps individuals to maintain a healthy, balanced diet.

- The scheme was recommended by the UK Food Standards Agency after a lengthy research project and consultation exercise.

- It gives consumers consistent nutritional information, per 100g. This enables them to compare products on a like by like basis, irrespective of portion size.

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8 ‘Logoland – simplified nutritional labelling in the Netherlands’. Consumentenbond, September 2007
9 Food Standards Agency. Signpost Labelling Research Summary: http://www.food.gov.uk/foodlabelling/signposting/signpostlabelresearch/
10 Food Standards Agency. Signpost Labelling Research Summary: http://www.food.gov.uk/foodlabelling/signposting/signpostlabelresearch/
11 Food Standards Agency. Signpost Labelling Research Summary: http://www.food.gov.uk/foodlabelling/signposting/signpostlabelresearch/
Supermarkets that have adopted the traffic light scheme have seen buying behaviour move towards healthier products. There is also evidence that it encourages manufacturers to reformulate products to make them healthier, by reducing salt and fat content for example.

The plethora of different signposting schemes already used by retailers and manufacturers across the EU inevitably results in consumer confusion. Research has also shown that consumers want a single, universal labelling scheme. A 2006 Which? survey found that 73% of people questioned felt it would be confusing if different producers used different types of schemes. In addition, a 2006 YouGov survey found that over nine out of ten respondents want the food industry to unite and adopt one clear, simple system.

- **ADDITIONAL FORMS OF EXPRESSION (SUCH AS THE COLOUR-CODING OF NUTRIENTS AT NATIONAL LEVEL)- ARTICLE 44 AND ARTICLE 33.**

**Commission proposal:** Member States may adopt, recommend or otherwise endorse national schemes consisting of exclusively non-binding rules.

**Our view:** If the EU does not support mandatory colour coding of nutrients on the front of pack it is vital that Article 44 be flexible enough to allow additional forms of expression at a national level. For instance, the UK should be able to continue to use its traffic light labelling scheme as there is clear evidence that different groups of consumers in the UK find it works best.

We believe that EU-wide regulation should underpin and not limit the implementation and refinement of national schemes in Member States, particularly where such schemes have been shown by publicly available research to help consumers in their decision-making about foods. The UK Government is seeking to encourage the food and retail industries to adopt the traffic light labelling scheme.

For further information, please contact publicaffairs@cancer.org.uk or +44(0)207 061 8360.