

Title of Report:	CONSULTATION ON FRONT-OF-PACK NUTRITION LABELLING IN THE UK
Committee Report Submitted To:	ENVIRONMENTAL SERVICES COMMITTEE
Date of Meeting:	13th October 2020
For Decision or For Information	FOR DECISION

Linkage to Council Strategy (2019-23)	
Strategic Theme	Resilient, Healthy and Engaged Communities
Outcome	Provide consultation response
Lead Officer	Head of Health & Built Environment

Budgetary Considerations	
Cost of Proposal	N/A
Included in Current Year Estimates	N/A
Capital/Revenue	N/A
Code	N/A
Staffing Costs	N/A

Screening Requirements	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals		
Section 75 Screening	Screening Completed:	Yes/No N/A	Date:
	EQIA Required and Completed:	Yes/No N/A	Date:
Rural Needs Assessment (RNA)	Screening Completed	Yes/No N/A	Date:
	RNA Required and Completed:	Yes/No N/A	Date:
Data Protection Impact Assessment (DPIA)	Screening Completed:	Yes/No N/A	Date:
	DPIA Required and Completed:	Yes/No N/A	Date:

1.0 Purpose of Report

The purpose of this report is to provide a Causeway Coast and Glens Borough Council response to the consultation.

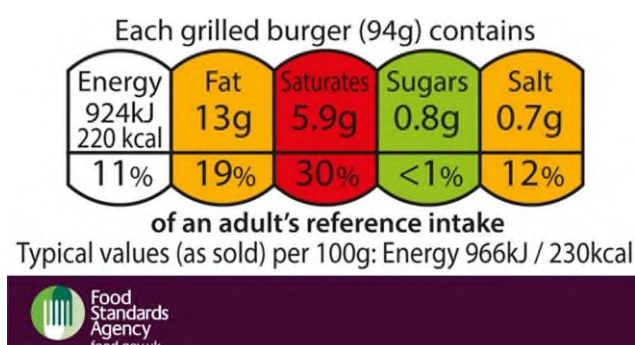
2.0 Background

The Food Standards Agency in NI, working in partnership with the Department of Health and Social Care, Food Standards Scotland and the Welsh Government, launched the joint four nation Front of Pack Nutritional Labelling consultation in August 2020.

Front of pack nutrition labelling has been recognised as an important tool to support consumers to better understand the nutrient content of their food and drink. This 'Call to Evidence' consultation aims to ensure that the UK front of pack nutrition label on prepacked foods still meets the needs of shoppers to make informed purchasing decisions for themselves and their families. The objectives of the four nation consultation are to:

- ensure the UK has a front of pack nutrition label that is evidence based and supports all consumers to make healthier decisions about the food and drink they buy
- maintain and extend the use of front of pack nutritional labelling across the widest range of appropriate food and drink products and
- achieve the greatest possible consistency in the way this information is presented, taking account of what is known about the forms of presentation that support shoppers to make healthier choices.

The current UK voluntary front of pack nutrition label referred to as the 'multiple traffic light' label (see below) was agreed and recommended by the four Health Ministers in 2013. This label uses a colour coded system to demonstrate at a glance whether a product is high (red), medium (amber) or low (green) in fat, saturated fat, sugars and salt, in addition to providing information on energy.



The full consultation paper can be found at:

<https://www.gov.uk/government/consultations/front-of-pack-nutrition-labelling-in-the-uk-building-on-success>

Attached as Appendix 1 is a suggested response to the consultation. The closing date for submission of responses to the Department of Health and Social Care is 21st October 2020.

3.0 Recommendation

It is recommended that Council endorse and submit this response pending full Council approval due to submission time constraints.

Appendix 1

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

Causeway Coast and Glens Borough Council Consultation response

Causeway Coast and Glens Borough Council welcome the opportunity to comment on the current UK and international Front of Pack Nutrition Labelling (FOPNL) and incorporation of updated nutrition guidance into a future scheme as part of this consultation.

The UK's recommended FOPNL scheme

Questions 1 – 5 for businesses

No response required

Questions for the public and organisations

6a) Do you use the Multiple Traffic Light label to make choices about the food and drinks that you buy?

Sometimes

6b) Please explain your choice

Council acknowledges that Front of Pack Nutrition Labelling is an effective means of helping shoppers make informed decisions when purchasing food, enabling healthier choices.

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

Clear - Yes

Informative - Yes

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

Individual nutrients - Easy

Use of red, amber and green colours - Very Easy

Reference Intakes - Moderate

Portion Size - Moderate

8. How could the Multiple Traffic Light label be made easier to use?

Causeway Coast and Glens Borough Council is of the opinion that although aspects of the Multiple Traffic Light labels are easy to understand it contains quite a lot of information which requires time to read and comprehend which not all shoppers may take the time to do.

Causeway Coast and Glens Borough Council believes that although the nutrient component of the label and the use of red, amber and green is easily understood, with these nutrients individually rated the consumer is required to make a judgement on which of the components is most important to them when making their food choices. An overall rating of the food would be easier to understand than making a choice between a food that is high in sugars or high in salt for example. Manufacturers may be more inclined to reformulate a product with a poor overall nutrition rating to improve healthfulness.

Causeway Coast and Glens Borough Council are also of the view that not all consumers understand the meaning of 'Reference Intake' and that simpler terminology would be more easily understood. In addition there could be confusion between 'Portion Size' and 'Typical Values (as sold) per 100g' particularly if used interchangeably which can also affect the ability to accurately compare similar products.

9. Would you find it helpful if more products displayed the same Front of Pack Nutrition label?

Yes

New International Examples

Questions 10 for businesses

No response required

Questions for the public and organisations

11a) Do you think you would be likely to use one of these labels more when shopping ... compared to current Multiple Traffic Light label?

Yes

11b) If answered yes – Which label would you be more likely to use?

- Chile Warning Label
- Nutri-score ✓

Questions for all respondents

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

- Use of five colours – like ✓
- Use of letters – dislike ✓
- Lack of specific nutrition information and portion size – like ✓
- Providing a single score for a product to indicate overall healthfulness – like ✓

Other (please specify)

- Standardised format – like ✓

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

- Use of colour (black and white only) – dislike ✓
- Highlighting only less healthy options – like ✓
- Lack of specific nutrition information and portion size - like ✓

Other (please specify)

- Standardised format – like ✓

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 – No, Council has no specific evidence to provide on this aspect.

- Healthier purchasing behaviours – No, Council has no specific evidence to provide on this aspect.

15) Are there any other Front of Pack Nutrition Label that you think Government should consider? Please provide evidence on the following to explain your answer:

Understanding or identification of healthier choices – No, Council is not aware of any other FONP labels that should be considered.

- Healthier purchasing behaviours – No, Council is not aware of any other FONP labels that should be considered.

Link to Dietary advice

16) Do you think the Government should ensure that the recommended Front of Pack Nutrition Label reflects latest dietary advice on free sugar?

Yes Causeway Coast and Glens Borough Council is of the opinion that any Front of Pack Nutrition Label should reflect the latest research and dietary advice on free sugars and notes information on free sugars is not included in the current UK recommended FOPNL scheme.

Causeway Coast and Glens Borough Council acknowledges it would be difficult to incorporate this easily into the existing scheme whilst ensuring all the information provided can be easily understood and it may work better with international examples such as Nutri-score. A public education campaign on free sugars and the benefits of reducing their intake would be key if free sugars were to be added as a further individual nutrient to the existing FOPNL scheme.

17) Do you think the Government should ensure that the recommended Front of Pack Nutrition Label reflects the latest dietary advice on fibre?

Yes Causeway Coast and Glens Borough Council is of the opinion that any Front of Pack Nutrition Label should reflect the latest research and dietary advice on fibre and notes information on fibre is not included in the current UK recommended FOPNL scheme.

Causeway Coast and Glens Borough Council acknowledges it would be difficult to incorporate this easily into the existing scheme whilst ensuring all the information provided can be easily understood and it may work better with international examples such as Nutri-score. A public education campaign on fibre and the benefits of increasing its intake would be key if fibre were to be added as a further individual nutrient to the existing FOPNL scheme.

Public Sector Equality Duty

18A) Do you think the 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 – disability only

18b) Please explain your answer and provide relevant evidence.

Causeway Coast and Glens Borough Council is of the opinion that consideration should be given to persons with learning difficulties and visual impairment when designing any FOPN label. Persons with learning disabilities may have difficulty understanding nutrition information presented as statistical data. A simple, more easily understood format which rates the overall healthfulness of a product would better enable this group to make healthier food choices when shopping.

People with a visual impairment may have difficulty reading written information in a small font on FOPN labels. A simple, easily seen, clear rating of the overall healthfulness of a product would better enable this group to make healthier food choices when shopping. This is an opinion and so Council has no specific evidence to support this view.

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 under the Equality Act 2010 – Yes
- Advancing equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it – Yes
- Fostering good relations between persons who share a relevant protected characteristic and persons who do not share it - No

19b) Please explain which aims it would help achieve and how.

See response to question 18.

19c) Could the proposals be changed so that they are more effective? Please explain what changes would be needed.

See response to question 18.