



**EPHA position on labelling – June 2008**

**Position of the European Public Health Alliance to  
the proposal on Regulation on the provision of  
food information to consumers (COM (2008)40final)**



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### EPHA's general comments on the proposal

The European Public Health Alliance (EPHA) represents almost 100 non-governmental and other not-for-profit organisation working in support of health in Europe. EPHA aims to promote and to protect the health interest of all people living in Europe and to strengthen the dialogue between the EU institutions, citizens and NGOs in support of healthy public policy (<http://www.ephha.org>)

EPHA has closely followed the development of the proposal on the Regulation on the provision of food information to consumers (COM (2008)40final)(1) and other EU initiatives related to food labelling because of the great importance of this issue for public health.

EPHA welcomes the new proposal from the Commission but believes that even more steps should be taken to protect the health and well-being of European citizens in combating the fight against obesity.

Recent data have clearly indicated that obesity rates are increasing all over Europe. The prevalence of obesity among children in the EU is among the highest in the world and the numbers of obese and overweight children are rapidly growing with around many thousand new cases every year(2).

Among adults the figures cause great concern with an expected prevalence to of 150 million adults and 15 million children by 2010. Childhood obesity is strongly associated with risk factors for cardiovascular diseases and diabetes, orthopaedic problems and mental disorders.

Obesity is also linked to underachievement in school and to lower self-esteem(3). These problems are costly to treat and obesity is already responsible for 2-8% of health costs, not taking the indirect costs into account, and 10-13% of deaths in different parts of the European Region(4).

This data gives a clear indication of the challenge European citizens and policy makers are facing. One of the important aspects of preventing obesity is to be able to identify healthy foods.

In the proposal on 'Food information to consumers'(page 4), the Commission states that one of the conclusions resulting from the initial consultation is that '**consumers demand more and better information on labels and are interested in clear, simple, comprehensive and standardised and authoritative information**'. This is a direct message from the consumers expressing that current labelling is simply not good enough.

Another conclusion from the proposal of the Commission is that '**consumers find it difficult to read and understand labels**' and EPHA therefore proposes the introduction of a mandatory traffic light labelling scheme in Front of Pack (FoP) to empower the consumers.

EPHA would like to stress the importance of producing European Dietary Nutrition Guidelines to support the proposal on Regulation. A harmonization of the existing national guidelines is necessary to provide a reference point to compare diet against for consumers to develop harmonized guidance (5). This work could be carried out by European Food Safety Authority(EFSA).

The obesity epidemic has a tremendous effect on social and economic development in Europe and EPHA believes that efficient and understandable labelling is a part of a first step to tackle the problem and enhance better food information to consumers. We must empower the European consumers to inform and understand their food choices are and promote an anti-obesogenic environment.



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### **EPHA members comments on the proposal**

Clear and consistent food labelling is essential for people with diabetes who need to know the exact carbohydrate content of foods, listed in grams. Carbohydrates should be listed in the mandatory nutrient profile on Front of the Pack label so that people with diabetes who are taking insulin or glucose-lowering tablets are able to match the timing and dosage of their medication to the exact quantity of carbohydrates contained in the food. Where sugars are listed, carbohydrate information should also be given to avoid confusion. IDF Europe would also like to see the introduction of food information for non pre-packaged food, where possible, for the reasons outlined above.



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### EPHA's position on the proposal ' Food information to Consumers'(1)

EPHA supports the general rules laid out in the Commission's proposal(1), however would like to put forward additional suggestions as to how the proposed regulation can meet the needs of European consumers and play a role in combatting obesity levels in the European Region.

EPHA considers the new labelling proposal a step towards improving the protection of public health in Europe, since it proposes mandatory labelling instead of self regulation or codes of best practice by industry.

The additional suggestions by EPHA are:

- Mandatory nutrient labelling on Front and Back of Pack
- Mandatory Traffic Light Labelling Scheme on Front of Pack
- Mandatory additional nutrients information on Back of Pack
- Mandatory nutritional information, total pure alcohol, potential allergens and list of ingredients on **all** alcoholic beverages

EPHA would like to emphasise the support of the following points in the proposal:

- Mandatory nutrition declaration on energy, saturated fat, total sugars and salt on Front of Pack
- Requirement for legibility of labels (minimum font size and printing requirements)

### Mandatory labelling on Front and Back of Pack

EPHA supports the Commission's proposal to make nutrition labelling mandatory, however EPHA demands mandatory labelling on **both** Front of Pack (FoP) and Back of Pack (BoP). In the proposal only FoP labelling is mandatory.

Mandatory labelling of nutrients provides clear signals to consumers and supports public health goals.

As nutrition labelling is a necessary and established way to support and inform consumers about health conscious food choices, EPHA believes that the required information as stipulated should be available on FoP and BoP. As mentioned in the Commission proposal on page 4, nutrition labelling is a means to strengthen and enable consumers in choosing a balanced diet.

### Mandatory Traffic Light Labelling Scheme on Front of Pack

As stated in the White Paper on Nutrition, Overweight and Obesity consumers have a need for clear, consistent and evidence-based information(6).

EPHA considers the **Traffic Light Scheme** (see Figure 1) as the most comprehensible system and believes that it enables consumers to make the most healthy choice as part of their diet.

The Traffic Light Scheme is a multi colour coding system using red, amber and green to represent high, medium and low content of nutrients.

Following the evidence available (7), EPHA urges the Commission to make the Traffic Light Scheme mandatory on FoP in the EU.

On 27 May 2008 the European Parliament's Committee on Environment, Public Health and Food Safety adopted an amendment calling for mandatory front of pack nutrition labelling using colour



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coding in the Commission proposal on nutrition labelling in its report on the Commission's White Paper on Nutrition, Overweight and Obesity related health issues.

As proposed by the Commission, the %Guideline Daily Amount(GDA)<sup>1</sup> (See figure 2) could accompany the Traffic Light Scheme on FoP, however research has shown that labels, which only highlight %GDA do not help consumers to make the healthiest choice.

Combining the Traffic Light Scheme with %GDA is only an option if they are represented per 100g/ml, as portion sizes are still not harmonised in the EU.



Figure 1. Example of the Traffic Light Scheme<sup>2</sup>.

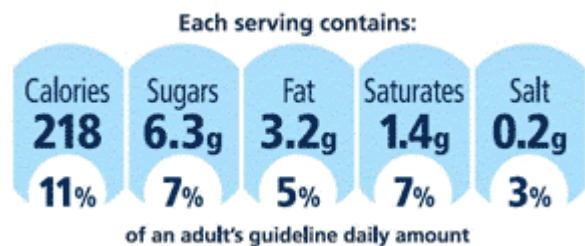


Figure 2. Example of the %GDA Scheme

### Mandatory nutrition declaration on energy, saturated fat, total sugars, and salt on Front of Pack

EPHA supports making energy, saturated fat, total sugars and salt mandatory on FoP. These nutrients represent what consumers first and foremost are looking for in order to pursue a healthy diet. More extensive information, necessary for specific dietary conditions such as diabetes, should be mandatory on BoP as described in the next section.

As mentioned these nutrients should be shown in a Traffic Light Labelling Scheme to enable the consumer to have a quick and understandable overview when they are shopping.

### Mandatory additional information on Back of Pack (BoP)

Informed consumers are likely to use BoP as an important additional source of information. Therefore EPHA urges to make additional information on nutrients mandatory(7).

The additional information is not only important for the general public, but it helps consumers who need to follow special dietary requirements such as people suffering from diabetes, heart diseases, overweight and obesity. Furthermore it can guide groups (e.g. parents) to understand the product's full nutritional value.

BoP nutrition labelling must include the FoP nutrients AND protein, total fat, trans fatty acids, carbohydrates, added sugars, and fibre.

1 The %GDA usually shows the amount of calories, fat, saturated fat, sugar and salt contained in a product as a percentage of recommendations for an average adult of healthy weight and average activity level pr. portion size. The %GDA is a voluntary scheme used by the food and drinks industry and the companies can decide e.g. what nutrients are shown, if they are shown by portion size or pr. 100 g. or whether if sodium is used as value instead of salt.

2 This example is demonstrating pr. serving, however EPHA recommends using 100 g/ml since serving sizes are not harmonised in the EU.



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### **Mandatory nutritional information, total pure alcohol, potential allergenic substances and list of ingredients on all alcoholic beverages**

EPHA believes that all alcoholic beverages, including beer, wine and spirits, should be required to state on their labels:

- Their ingredients
- Any substances with allergenic effect
- Relevant nutrition information
- Total grams of pure alcohol pr. 100 ml. or pr. Units.

Providing this information on alcohol labels will allow consumers to make informed choices about their alcohol consumption by:

- Assessing the quality of the beverages (for ingredients)
- Helping them to avoid potentially dangerous physical reactions (this is for ingredients and substances with allergic effect)
- Better understanding of how their consumption of alcohol fits into their daily diet (for calories)
- Keeping track of their alcohol intake (for the grams of pure alcohol)

### **Requirements for legibility of labels**

The consumer has the right to know the nutritional value and ingredients of products, however if it is impossible to read the labels the information is of little use. EPHA supports the Commission's proposal on increasing the legibility of labels by introducing a font size of minimum 3 mm. The proposed significant contrast between print and background is important to guide consumers to the label and allows them to read the information. If the product size makes it difficult for producers to follow the requirements, marketing size should be reduced.



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### References

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- (6) Commission of the European Communities. (2007). *White Paper on a Strategy for Europe on Nutrition, Overweight and Obesity related health issues*. [http://ec.europa.eu/health/ph\\_determinants/life\\_style/nutrition/documents/nutrition\\_wp\\_en.pdf](http://ec.europa.eu/health/ph_determinants/life_style/nutrition/documents/nutrition_wp_en.pdf) (Accessed June 20<sup>th</sup>, 2008)
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