

Front of Pack Sub Group Draft Response

Sub Group Members

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Question 1:

We welcome your views on the range of foods to which an integrated FOP label should be applied, including suggestions for a limited number of exemptions (paragraph 20).

Para 20

In pre-consultation discussions with stakeholders the following food products were suggested as possible products that could be exempt from FOP labelling:

- Single ingredient foods, staples and primary produce such as:
 - cereal based products including rice, pasta, flour, bread,
 - meat, fish, poultry (unprocessed),
 - milk and some dairy produce (including cheese),
 - bacon and ham.
- Fresh and minimally processed fruit and vegetables
- Foods sold in packages with small surface area

1. The Scottish Food Advisory Committee (SFAC) agree that unprocessed primary produce such as meat, fish, fruit and vegetables, and simple cereal based staples including rice, pasta and flour should be exempt from an integrated FOP label. The committee would strongly recommend that bread should not be exempt because of the large variety of breads that are available in the marketplace with varying nutritional content. For processed foods that can be high in salt or fat such as Dairy produce (including cheese), Bacon and Ham, SFAC would recommend that Industry works towards delivering voluntary FOP labelling for these items.

2 Question 2:

We welcome your views on the proposal for including calories in an integrated FOP label (paragraph 27), and that interpretive elements should not be included.

(Para 27)

If calories were to be included with text and traffic light colours then criteria would need to be developed. The green (low) threshold would be set at

≤40kcal per 100g¹ and the red (high) threshold would be set at 500kcal/100g² and 600kcal per portion (if the approach used for other nutrients is applied) in line with Regulation EC 1924/2006 on nutrition and health claims made on foods which applies when making 'low' and 'high' claims. In effect this would mean that nearly all products would receive an amber traffic light for calories, so provide little additional benefit to consumers and limited incentive for manufactures to reduce the calorie content of their products.

2. The Committee would strongly agree with this proposal. Calories are an important consideration for many consumers so are useful to be included within the integrated FOP label. Interpretive elements are not appropriate as they provide little additional benefit and indeed may cause confusion for consumers as it is quite possible that a product that meets all the criteria for the green/low thresholds in the individual components could still achieve amber/medium for calories.

Question 3:

Should the Agency develop specific criteria for an integrated FOP label for foods recommended to be eaten in small portions, to be used alongside the per 100g criteria and specific criteria for large portions? If so what should these criteria be? Or could foods recommended to be eaten in small portions be dealt with in other ways?

3. The Committee would recommend proportionality, simplicity and common sense in regard to this question. However, in the case of multiple buys for example, the Committee would recommend that such products be differently and appropriately labelled compared to that of single buy examples. If any of the components fall into the red/high category as specified in table 1, page 20 then the Committee would recommend that this must be labelled on the integrated FOP label.

Question 4:

Do you agree with the proposed approach to improve communication and understanding of saturated fats in an integrated FOP label (paragraph 34)? If not why not?

Para 34

Most businesses currently use the term 'saturates' on FOP labels and this corresponds with the use of 'saturates' on back of pack nutrition information. **The Agency therefore suggests the term 'saturates' is used in an integrated FOP label to ensure consistent communication and that more**

¹ In line with the low threshold in the European Regulation (EC) No 1924/2006 on nutrition and health claims.

² ie 25% of recommended intake levels (based on female Estimated Average Requirement of 2000 kcal/day) per 100g

is done to educate consumers about the term and the need to reduce intakes of saturated fat.

4. SFAC would agree with this proposal.

Question 5:

In light of EFSA's recent opinion on the sugars GDA for nutrition labelling purposes, we would welcome your views on the appropriate sugars GDA figure that should be used on an integrated FOP label.

5. There is insufficient evidence currently available for the Committee to make a proportionate comment. The Committee would request the SACN report on the relationship between carbohydrates and metabolic health to be made available as soon as possible.

Question 6:

We would welcome your views on the whether the salt thresholds for an integrated FOP label should be revised and if so which of the approaches discussed above should be used:

- (a) changes to the per 100g criterion,***
- (b) changes to the per portion criterion, or***
- (c) both.***

6. SFAC would agree with aligning the per 100g salt thresholds with the proposed EU Nutrient Profiles in the Nutrition and Health Claims Regulations (NP NHCR) for both per 100g and per portion, particularly considering that there is a lack of sound scientific evidence to suggest otherwise. It makes sense to implement this change at the same time as either the Food Information Regulation or NP NHCR whichever is the sooner.

Question 7:

The proposed advice on prominence and legibility based on the Agency's current technical guidance can be found at Annex D. We welcome your views on how this might be revised to maximise the visibility and legibility of an integrated FOP label.

7. The focus needs to be on legibility and contrast rather than font size. A font size guideline is useful but only covers height of text not width or readability. A footnote to further clarify the definition of font size would be helpful. Annex D makes no mention of the colours to use within the label. Further guidance without being overly prescriptive may be helpful on colours to use that help colour blind and visually impaired people to distinguish between the categories. Colour coding has the most benefit if it can be recognised at a glance.

Question 8:

We welcome your views on how government and stakeholders could work in partnership to raise consumer awareness and understanding of a single integrated FOP label (targeting those consumers that are not currently using FOP labelling, and in particular C2DE's, those aged over 65 years and families with children). We would welcome any information regarding initiatives or activities that have been undertaken in this area.

8. SFAC would recommend exploring activities in the following areas:
Libraries and schools – giving out bookmarks; Retirement groups e.g. WRI, Probus; Community Centres; Advertising on Buses and Local Community Radio; Working in partnership with retailers to highlight new look integrated FOP labels.