

Summary of Responses to Consultation on the Agency's further Consumer Research on Signposting Labelling

Questions for Comments	Comments	Respondent
Proposed Methodology		
<i>Supportive</i>	The Proposed methodology is sound	SCC NCC Glasgow Dairy Council Cadbury Diabetes UK Kraft GCCNI
<i>Other</i>	The research should establish whether signposting helps consumers make informed choices at the point of selection	Nestle
	Many questions; Are any of the formats based on current practice?, do they take into account "lessons learned" form industry?, Has visual impairment been considered?, Are there any other colours that cannot be used?	BNF
	Many questions; How does recruitment take place?, Are quotas being imposed?, How will a good cross-section be ensured?	HPA NI
	Unclear if the respondents would be shown all 3 or 4 of the concepts sequentially or monadically - A sequential approach is recommended	BRC
<i>Aim of Research</i>	The objective should be "to examine to what extent and in what way that more informed assessment actually impacts on consumers food purchasing habits; and therefore dietary behaviour	McCain
	Pleased that the research will test consumers understanding of the most popular concepts	BRC
	The objective should be "To recognise which, if any signposting approach is most helpful"	GFV
	The research would be enhanced by its ability to assess 1) effects in a real-life scenario, and 2) impact on long-term food choice and total dietary intake.	LMCNI
<i>A total of 1,300 or 1,700 hall based interviews</i>	Larger sample sizes are encouraged to allow greater statistical power to analyse subgroups including regional differences and the impact in ethnic minority groups	MRC
	This should be done at home	GFV
	This is a robust sample, although if it is monadic, it is not clear why the sample size would need to be increased.	CoOp
	Research methodology is potentially weak in its capacity to assess whether a consumer in a real-life situation would use this information to make food choices	LMCNI
<i>Around 25 minutes in length</i>	Not clear if the time spent on each option will be controlled, to ensure that options are not over-analysed	Organix
	Most consumers make food choices in a limited amount of time, therefore it is questioned as to why 25 minutes is required to analyse the label, and if such a length of time is required to do so, then are the labels really going to be any more useful to consumers than the current status quo	Dairy Council
Quantitative analysis by gender, age, life-stage, socio-economic group, and interest in diet-related health issues		
	Respondents should be mainly/jointly responsible for food shopping and preparation (and should be screened out if not)	CoOp BRC Kraft IP 04
	It does not account for regional variations	GFV
	Sample size for devolved administrations is too small, not clear how balanced the data will be when it is broken down into sub-sets (age, gender etc)	SFAC SE

	The visually impaired should be considered in this research	SFAC GCCNI
	A wider group is necessary	FDF
	It would be useful to check understanding of nutrition issues; e.g. many diabetics are confused about sugar content of foods and incorrectly assume that fruit cannot be consumed due to fructose content	Diabetes UK
	Gender balance is important, since it is women who make the actual purchase; the survey should be biased towards women	IP 02
	Consideration should be given in the analysis of results by subjective segmentation of respondents according to their build (e.g. thin/average/overweight/obese) – The interviewer should assess this. This is important as the responses of the overweight or obese may be more relevant to the desired outcome.	BCB
Assessing consumer use and understanding of the signposting options and preferences between the tested formats.		
	It would be useful for check respondents understanding that the inclusion of high fat and high sugar products as part of a balanced diet is not detrimental to health	Diabetes UK
	Respondents should be asked whether they considered per serving or per 100g useful when comparing different foods	Diabetes UK
	There should be a question asking how often consumers use the current labels	IP 02
	There should be a question asking what consumers feel is missing from labels	IP 02 McCain
Visual stimulus material		
<i>Crisps</i>	Keen to have crisp category , recommended that a multipack format is used therefore larger than A4 sized board in recommended	PepsiCo
<i>Chocolate</i>	Chocolate confectionery should be considered, in terms of contribution to calorific intake and frequency of consumption in both adults and children	BCB
<i>Categories</i>	Product groups could be better defined and possibly increased; a high protein example would be useful	IP 02
	Products should enable research to assess how consumers would distinguish between products that had a range of ambers/greens and reds i.e. how would they distinguish between a product with mostly ambers, and a product with a mix of red and greens?	Which? BNF
	Important to test legibility on small packages as well as large, therefore a wide range of products need to be tested	Kelloggs
	The four chosen categories appear to only reflect foods perceived as "unhealthy"; the list should include foods known to be part of a healthy diet, but that might be labelled "red"	FUW
	It is important to highlight the difference between healthy and unhealthy foods within the same category	Organix Nestle BNF
<i>Stimuli</i>	Mock-ups of real packaging is recommended	MRC CoOp BRC
	Visual stimuli should be mocked up to the size in which they appear on product packaging and not artificially enlarged in order to facilitate ease of reading.	GCCNI
<i>Other</i>	It would be beneficial to provide the respondents with mocked up food products which they would then take home, allowing them to become familiar with the products. A follow up interview could then be conducted	Dairy Council
	Mock labels should carry common claims in order to gauge consumer reaction to signposting options that may duplicate the information	NCC
	Recommend the inclusion of a healthy product option, such as fruit juice, as all the listed product categories may be considered less healthy. There is merit in ensuring that the list of product categories is drawn from the top ten products (as determined by sales volume)	GCCNI

	in order that there relevance to consumer food choice and dietary habits is assured.	
	It is important to incorporate foods where the message gets complicated, eg; low in fat high in sugar and vice versa.	HPA NI
<i>Supportive</i>	This proposed methodology is agreed with	Dairy Council
	It is known that consumers in nutrition labelling studies are opened to socially desirable reporting and may look at labels without being able to fully understand them	Dairy Council
Follow-up qualitative interviews.		
	Follow up interviews may find that the consumers preference for a particular option changes once they have had the time to become familiar with it	Dairy Council
	It is not clear what the objective of this work is, and why it is weighted to C2DEs	CoOp
	Qualitative research must be conducted in each of the four regions of the UK, including Northern Ireland for reasons of particular diet and health considerations.	GCCNI
<i>Suggestions for additional research</i>	Extra research should be carries out with a professional caterers/chefs	IP 04
	Research should investigate the merits of communicating frequency advice alongside the signposting in that the frequency of eating red signposted products may be more important than the composition of the single food product.	GCCNI
Signposting concepts to be included in research		
<i>Other</i>	Many consumers want data on artificial additives	Organix
	Both GDA formats are unnecessarily wordy	BNF
	When assessing the usefulness of colour coding; it is necessary to bear in mind that diabetes is the leading form of blindness in the UK and projected rates of diabetes linked eye disease suggest that 60% of type II and nearly all type I diabetics will have some degree of eye disease 20 years from diagnosis	Diabetes UK
Simple traffic light		
<i>For</i>	Support inclusion	Which? Foodaware
<i>Against</i>	Too simple, foods will be demonised	IP 02 CASH Organix Nestle Kelloggs BCCCA FDF Masterfoods IP 04
<i>General comments</i>	Respondents should be asked how they interpret the wording assigned to the simple traffic light.	BCB
Multiple traffic lights		
<i>For</i>	Support inclusion	Which? McCain Foodaware
	Prefer the multiple traffic light , it follows the balance of good health and also ties in with the food labelling guide.	IP 01
<i>Against</i>	Too difficult to use "at a glance" ; not considered helpful for healthy foods with many ingredients (natural/organic/GM free etc)	Organix Kraft
<i>General comments</i>	Need to use common phraseology ie saturated fats, not saturates	GFV
GDA based concept with colour coding		

<i>For</i>	Support inclusion	Which? BMPA MLC Foodaware BCB
	This option is favoured, most people would be able to understand it and the use of colour aids the "at a glance" identification of nutrient levels	IP 02 CASH
<i>Against</i>	Too complicated; majority are not able to make a choice between products with numerous different variables	Nestle
	This concept does not lend itself to front of pack "at a glance" communication	CoOp
	Does not meet the objective of providing "at a glance" information to indicate the better choice within a product category	Kraft
<i>General comments</i>	If used, GDAs need to cover both adults and children; split according to nutritional requirements	Organix
	The GDA model has not been developed to its full potential	Dairy Council
	Consumer understanding of "GDA" is questioned	Glasgow
	GDA with colour – queried if this is per 100g or per serving; consumer confusion if both are referred to. GDAs only make sense on a per serving basis ; Strongly recommend using per serving colour coding	PepsiCo Kelloggs
	GDA colour coded option : The per serving amount should be colour coded rather than the part which states the nutrient, otherwise fat / salt / sugar are labelled green and this would cause confusion; the colouring appears to apply to the GDA values rather than the nutrient supplied per serving	EU Food Law Organix SFAC BNF
	Consumers who need more information will find these concepts too difficult to use. Both GDA concepts rely on consumer time, interest and understanding; the consumer who currently uses back of pack information, are those who are likely to use the signpost.	SQS
	Although the inclusion of a GDA option is welcomed, there seems to be an overwhelming bias towards traffic light models, with even the GDA model including a traffic light component	Dairy Council
	Will assessment be made if respondents have a tendency to compare amounts in the product with GDA amounts for the day without taking into account of what else is being consumed that day?	HPA NI
<i>Other</i>	Surprised at apparent predominance of formats based on percentage declarations and on the use of bar charts. The lack of numerically skills and failure to grasp percentages in UK, is well known	CoOp
	Concerned that size constraints in labelling, have not featured in the proposed executions and that the signpost labelling will conflict current Agency guidelines on Clear Labelling.	CoOp BRC
	FSA should reconsider the visual presentation of the proposed formats before undertaking the next phase of research, rather than identifying a format that works as currently presented	CoOp
	There would be additional benefit in providing information which allows the consumer to select healthier foods within categories	MRC
	The disadvantages of bar charts for graphical expression of nutrition information was highlighted by MAFF's research in the 1980s - Difficult to envisage how the GDA concept could be depicted graphically in a simpler more accessible way	CoOp
<i>Nutrients</i>	Total fat should be replaced by energy	IP 03
	Calorific value should be included and highlighted in order to stress the importance of a balanced diet	IP 03 FDF Masterfoods BCCCA SNACMA
	It would be more appropriate to include another index of carbohydrate quality such as fibre	MRC
	The inclusion of salt as opposed to sodium is commended	CASH

	Previous research (MAFF, FSA, CoOp) has always highlighted the supremacy of High/Medium/low descriptors as the preferred method of communication	CoOp
Fourth option (Monochrome GDA based concept or no signpost)		
<i>Supportive</i>	Welcome inclusion of 4th option in research	PepsiCo BCB Dairy Council CASH Organix Which? GFV Kelloggs FUW BRC Diabetes UK Masterfoods
<i>Against</i>	The inclusion of a fourth option is not supported	NCC CRUK IP 01 SCC SFAC
	4th Option is not required, it would make the situation too complex for people to decide on.	IP 01 SCC
	There is no need for a fourth option; with the exception of the visually impaired, there is no obvious advantage of a monochrome GDA version; nor is there any merit in evaluating a "no signpost"	SFAC
<i>Other</i>	Both formats should be included	SE
	If no fourth option is included, it may be useful to keep the larger total sample and assess more than one sample site in Scotland	SFAC
<i>Suggestions for alternate fourth option</i>	It is suggested that the multiple traffic light in a monochrome presentation be selected as the fourth option	CoOp
	It is suggested that the current nutrition label panel is possibly colour coded to reflect high/medium/low and that it is moved to the front of the pack	MRC
	The simple traffic light should be replaced with the monochrome GDA concept rather than increase the option to 4, as too many options will be confusing.	IP 02
Monochrome GDA based concept		

<i>Supportive</i>	A monochrome format is an obvious preference, it should be included in the research; it is similar to current labelling of GDAs therefore should attract consumer acceptance, recognition and understanding	IP 02 Dairy Council Organix Nestle Kelloggs FUW BMPA BRC Diabetes UK Masterfoods FDF BCCCA Foodaware GCCNI
	Important to look at monochrome because of limits with packaging formats (ie milk packaging, supermarket "value" ranges) and cost implications. It will also assess the presentations usefulness for the colour blind	CoOp BRC
	The consumers who most likely use supermarket "value" ranges (which used only 2 colours to keep price down), are those who are targeted in the White Paper, therefore if signposting is being developed to help those with limited nutrition knowledge, it is essential that a monochrome option is tested	BRC
	At least 2 monochrome options should be included in the final options	FDF Masterfoods BCCCA
	The inclusion of this option is vital to ensure that there is no bias towards traffic light labelling	Dairy Council
	This option would have lower cost implications for industry	Dairy Council
	The proposed research would benefit from the inclusion of this option	PTF
<i>Against</i>	There is little value in wasting valuable resource in testing this model	NCC IP 04
<i>Other</i>	Previous research has shown that consumers prefer colour and that they found it helpful, in view of this, there is little point in including this option	Sainsbury's SFAC
	It is questioned why the GDA format has been singled out for monochrome presentation	CoOp
	This concept does not build significantly on "GDA based concept with colour coding".	LMCNI
<i>No Signposting: rely on the back of pack nutritional information alone as the source of information.</i>		
<i>Supportive</i>	Recommend including a control as the 4th option, ie – no Signpost	PepsiCo BCB Sainsbury's GFV MLC Cadbury SNACMA LMCNI
<i>Against</i>	Not in favour of this option	SCC Which? CRUK Foodaware GCCNI
<i>General comments</i>	The No Signposting option would be a wasted opportunity and undermine the work carried out by the FSA to date. In addition, exploring this option could be potentially damaging to public confidence in the FSA, which has already been given a strong message by consumers and Government that further practical guidance is considered necessary to assist dietary choice.	CRUK

	No signpost would act as a control, however, since the Agency are committed to signposting, a control is unnecessary.	CoOp
	Because of existing schemes, this option is not realistic	Diabetes UK
5th Option	It would be worth testing a uniform way of reporting minimum information on the back of pack, similar to the IGD standard GDA table	Sainsbury's
	An additional option should include Front of pack calories, full nutrition information on back of pack and GDA values for calories, fat and sodium	SNACMA
	Bar chart showing percentage contribution of key nutrients (without colour coding or high/medium/low ratings)	Kelloggs
	A "Positive" signposting option which leads the consumer to use the information on back of pack is suggested	Cadbury Kraft
	Support inclusion of a control throughout	BRC Masterfoods FDF BCCCA Kraft
	The current nutrition labelling should be moved to the front and should be colour coded to reflect high/medium/low levels of nutrients	MRC
	As there were no "clear winners" from the GDA further research, a fifth option should be included	Kelloggs
Other	Do not support expenditure of taxpayers money on this particular research	FAIA
	Is there going to be any front of pack advice on 'good fats'? e.g. some traffic light options might lead you to believe oily fish is less healthy as it would show as being high in fat.	HPA NI

RESPONDENTS

TYPE	ORGANISATION	CODE
INTERESTED PARTIES - 2	Bill Crosson – BC Consult	IP 02
	Peter Sanderson FSA	IP 03
CONSUMER ORGANISATIONS - 5	National Consumer Council	NCC
	Scottish Consumer Council	SCC
	General Consumer Council Northern Ireland	GCCNI
	Foodaware: The Consumers' Food Group	Foodaware
	Which?	Which?
MANUFACTURER and TRADE ASSOCIATIONS/ORGANISATIONS - 20	Biscuit Cake Chocolate and Confectionery Association	BCCCA
	British Cheese Board	BCB
	British Meat Processors Association	BMPA
	British Retail Consortium	BRC
	Cadbury Schweppes	Cadbury
	Farmers Union Wales	FUW
	Food Additives and Ingredients Association	FAIA
	Food and Drink Federation	FDF
	Kelloggs	Kelloggs
	Kraft Foods	Kraft
	Masterfoods	Masterfoods
	McCain Foods (GB) Lrd	McCain
	Meat and Livestock Commission	MLC
	Nestle	Nestle
	Pepsico	Pepsico
	Provision Trade Federation	PTF
	Snack Nut and Crisp Manufactureres Association	SNACMA
	Scottish Quality Salmon	SQS
	The Dairy Council	Dairy Council
		The Livestock and Meat Commission Northern Ireland
FOOD RETAILERS / RESTAURANTS / PRODUCT DEVELOPMENT AND ANALYSIS - 3	Co Operative Group	CoOp
	Organix	Organix
	Sainsbury's	Sainsbury's
PUBLIC HEALTH BODIES / NUTRITION INTEREST - 4	C.Morrell – Community Dietician	IP 01
	Cancer Research UK	CRUK
	Consensus Action on Salt and Health	CASH
	Diabetes UK	Diabetes UK
	Health Promotion Agency Northern Ireland	HPA NI
NUTRITION EXPERT GROUPS - 2	British Nutrition Foundation	BNF
	Medical Research Council	MRC
SPECIALIST PRESS - 2	Kate Trollope – EU food Law	EU Food Law
	The Guild of Food Writers	IP 04
CHILDREN/YOUTH INTEREST GROUPS		
SPORTS BODIES		
OGDs / NDPBs / DEVOLVED BODIES - 1	Scottish Executive	SE
LOCAL AUTHORITY / GOVERNMENT / ENFORCEMENT INTERESTS/ EU ORGANISATIONS - 2	Gloucestershire Food Vision	GFV
	Wendy Stewart - Glasgow City Council	Glasgow
ADVISORY COMMITTEE - 1	Scottish Food Advisory Committee	SFAC