

**EU FOOD LABELLING REVIEW****Executive Summary**

1. The purpose of this Paper is to seek the Board's views on a number of strategic labelling issues identified at the Board's Open Meeting on 21 September. The paper has been further informed by the Board Workshop held on 5 December, a note of which is available on the FSA website<sup>1</sup>, and discussions by the SWaNI Food Advisory Committees.
2. The issues for consideration are the establishment of labelling principles; the issue of labelling of foods sold loose; and proposals for further consumer research. The Paper also provides information on developments in Brussels on the EU Food Labelling Review and outlines various work streams being undertaken by the Agency.
3. The Board is invited to:
  - **discuss** and **endorse** the proposed labelling principles and consultation (para 4-9);
  - **agree** with the proposal that there are insufficient grounds to change the labelling requirements at EU level for foods sold loose/pre-packed for direct sale (including catering) but that the Agency should monitor consumer information needs for such foods (para 10-15);
  - **agree** that the Agency undertakes some behavioural research in order to test the validity of the proposed principles, noting that such research could cost in the region of £150,000 (para 16-19);
  - **note** the next steps and outstanding issues and indicate those labelling issues in which it has a particular interest (para 24-28).

**Labelling, Standards and Allergy Division**

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<sup>1</sup><http://www.food.gov.uk/multimedia/pdfs/fsaboardlab.pdf>

## EU FOOD LABELLING REVIEW

### Issue

1. The Board considered a Paper at its September meeting (FSA 06/09/03) that covered the entire labelling spectrum, including requirements that are the responsibility of other Government Departments. The Board concluded by asking Agency officials to draw up a set of overarching principles to inform labelling provisions as well as to investigate whether to undertake further consumer research with 'real' consumers in order to understand how consumers used labelling information.
2. This paper describes work so far and seeks the Board's input and advice on key issues. These have been further informed by the responses to the UK consultation on the Commission's discussion paper last year and the Board Workshop on 5 December. The views of the Advisory Committees in Scotland, Wales and in particular Northern Ireland, have also been reflected in the Paper.

### Strategic Aims

3. To enable consumers to make informed choices about the foods they buy. To develop the Agency's position on the simplification of EU Food Labelling Legislation.

### Discussion

#### ***Labelling Principles***

4. European food labelling<sup>2</sup> legislation covers both food and drink, and is based on three basic principles: to protect public health; to inform consumer choice; and to facilitate free trade within the Community. It governs both information on labels and information provided by other means, including advertising and presentation.
5. The Agency has been working within this framework to propose a set of principles that would cover the general provision of information as well as providing a basis for considering information that must be provided to the consumer on a mandatory basis. The proposed principles, set out in **Annex I**, would aid a review both of the current requirements as well as provide a framework for consideration of future information needs. The principles have been developed in-house and, subject to the Board's views, will therefore need

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<sup>2</sup> For the purposes of the EC labelling Directive, the definition of labelling is: "shall mean any words, particulars, trade marks, brand name, pictorial matter or symbol relating to a foodstuff and placed on any packaging, document, notice, label, ring or collar accompanying or referring to such foodstuff".

to be exposed to wider consultation. The European Commission has been informally notified of this approach.

6. In the short term, these principles if applied to packaged foods would mean all relevant information is on the label. However, if technology develops to allow this information to be provided in other ways, its use should be considered. The legislation that is developed should allow for changes/developments in technology and communication.

### ***The effect of the Proposed Principles on Mandatory Requirements***

7. Current mandatory labelling requirements in the Food Labelling Directive are shown at **Annex II**. These have been evaluated on the basis of the proposed principles and an illustrative example of the effect is at **Annex III**. Most of the current mandatory requirements fall into one of the proposed principles for the provision of mandatory information. Given the way requirements have developed over the years this is perhaps not surprising. For example, the name of the product, the name and address of the manufacturer, and the net quantity are regarded as essential information in relation to the integrity/identity of the product. Allergen information, 'use by' and 'best before' dates, and instructions for use meet the safety criteria and therefore need to be retained.
8. There are other requirements that are less clear cut. For example, so called 'double labelling', where an ingredient is declared in the ingredients list but must also be accompanied by supplementary wording. Some of these double labelling requirements are there to provide additional information for specific vulnerable groups in relation to safety/health warnings and would fall within the 'safety' principle. Other requirements such as those relating to sweeteners could perhaps be removed. It is questionable whether the 'Modified Atmosphere Packaging' (MAP) declaration is meaningful to consumers but it is intended to alert consumers to the fact that the product has been packed in a treated condition. It could also be argued that lot marking is of less importance in product recall because of the traceability requirements in the General Food Law Regulation 178/2002, although the view of LACORS is that it is still necessary because it enables more precise product identification.
9. Any proposal for changes to mandatory labelling requirements would need to be subject to public consultation and cleared across Government before being negotiated in Brussels. The Board is asked to comment on the proposed labelling principles outlined above, their application to the current mandatory requirements and to endorse consultation on the proposed principles.

### ***Foods sold loose/pre-packed for direct sale, including catering establishments***

10. In the EU, Member States may, on a national basis, decide how much of the current mandatory labelling information, if any, is required for such foods,

providing that the purchaser receives sufficient information. This minimal statutory approach is considered sufficient because this type of purchase is face to face with the vendor, who should be able to provide additional information on request. This approach also reflects the desire to minimise regulatory burdens on small and medium sized enterprises (SMEs).

11. Loose food accounts for a significant proportion of food sold in the UK (estimated at around between 30-40%, including catering establishments, butchers, bakers, grocers, fishmongers, delicatessens, etc), with most of this being UK produced. One of the points raised at the Board Workshop was whether such foods should be subject to the 'core' mandatory declarations that the proposed principles would require for pre-packed food. Such information could be made available in various ways, providing it was available at the point of purchase.
12. The view of the Northern Ireland Food Advisory Committee (NIFAC) is that all the required information should be made available at point of sale for such foods, but with some flexibility as to how. In particular, catering establishments should make available all the 'safety' information with the rest available on request. This should be on an EU wide basis.
13. Apart from achieving parity with pre-packed foods, the main reason for increasing requirements would seem to be that information provided may not be sufficient for consumers to make a fully informed choice, or to avoid inappropriate foods. A secondary reason may be whether sufficient information is provided on durability ('use by', 'best before').
14. As far as the EU review is concerned, retaining the existing national arrangement would seem appropriate for the following reasons. First, requiring EU labelling on such foods to be consistent with pre-packed foods would impose significant burdens on SMEs, at a time when Government is looking to reduce these. Second, there was no call for any extension of labelling in the case of such foods during the UK public consultation last year, with the exception of the declaration of allergens. The Agency is addressing this at UK level by means of Best Practice Guidance – expected to be published in summer 2007. This approach reflects the consensus from a recent UK public consultation carried out during the implementation of allergen labelling rules. A similar outcome has been identified in an EU study<sup>3</sup> and other Member States' responses to the labelling discussion paper were silent on this point.

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<sup>3</sup> A qualitative study, commissioned by the European Commission reported in May 2005 reported that during a study covering 28 European countries overall the perceived need for information in this sector was small based on a high degree of trust by consumers to begin with although there was a limited demand for country of origin labelling for single ingredient products in some countries. (Ref *European Consumers' Attitudes Regarding Product Labelling – qualitative study in 28 European countries* (OPTeM commissioned by DG Sanco), 2005.).

15. In view of the very limited interest regarding these foods during the consultation process (and the action already being taken to address concerns on allergens), the Board is asked to endorse the view that this issue should not be pursued at EU level. Nevertheless, the Agency should monitor consumer information needs for such foods. Should the need for any change become apparent, the UK could, subject to consultation, consider unilaterally what information should be presented and how.

### **Consumer Research**

16. The Agency has undertaken a literature review of the large amount of existing research encompassing not only UK research but also that undertaken by the European Commission and other Member States.
17. Details of the questions applied and our in-house assessment are attached at **Annex IV**. Our provisional conclusions are that many of the key questions have been addressed with the possible exception of purchasing behavioural studies.
18. As stated earlier, the Agency is working on a set of principles to determine the core information that must be available to the consumer. In addition to the proposed consultation on the principles, it is suggested that behavioural research is carried out at point of purchase, noting the type of information consumers look for when making their purchasing decisions to help inform whether the proposed principles are sound.
19. This in turn may identify whether there is a need for further separate research in order to identify the extent to which consumers would find acceptable ways of presenting the required information, other than on a label.

### **Benefits and Risks**

20. Simplification of labelling legislation is a key objective within the context of the Government's Better Regulation Initiative. The introduction of labelling principles would benefit all stakeholders, providing a clear framework within which both present and future labelling decisions could be based. The main risk is that this new approach may present difficulties for other UK Government Departments who have a significant stake in some of the wider CAP related legislation, or other Member States. Other Government Departments and Member States are currently being consulted informally, and a Regulatory Impact Assessment (RIA) will be produced as part of the formal consultation process – should the Board agree that this is the appropriate way forward.
21. Maintaining the *status quo* in the EC legislation for the labelling of loose foods etc., would be of considerable benefit to small businesses, because any increase in labelling requirements is likely to be costly. There is unlikely to be any adverse effect for consumers since, with the exception of allergens, there was no

demand for increased labelling. Should there be a call for further labelling information for such foods, the current EC labelling legislation allows the UK to take unilateral action.

22. Further research on the information used by consumers at point of purchase would provide valuable insights into what 'real' consumers need and help inform negotiating lines in Brussels. This research, however, is likely to prove resource intensive and costly. Typically such research costs £150,000.

### **Sustainability**

23. These proposals are likely to have a positive economic and social impact, as they seek to make the legislation simpler, for example, by removing duplication of labelling and minimising regulatory burdens on SMEs. It may also result in benefits in relation to packaging and printing usage. There is also likely to be increased consumer confidence in food labels with regard to their expectations for information they know must appear on labels. In addition, there will be long-term benefits from the consumer research in gaining better understanding of consumer behaviour and, for example, being better able to meet the needs of vulnerable groups, such as the disabled and low income groups. We have not yet carried out any sustainability assessments for proposals set out in this paper, but clearly as we develop agreed policy lines, we will ensure that this is done. Sustainability considerations will form part of the RIA.

### **Next Steps**

24. Following the Board's deliberations, the Agency will hold a full public consultation on the proposed principles. This will aim to elicit views from both small and large businesses, consumers and enforcers as to the different issues and practical considerations that will have to be taken into account in developing the labelling principles approach.
25. In Brussels, an initial Commission Experts' Group 'scoping' meeting was held in November 2006. This revealed that the thinking of most Member States was still at an early stage. A further meeting has been arranged for 15/16 February, but a firm proposal is not expected until December 2007, after which negotiations will begin in Council.
26. In addition to the labelling principles, there are also a number of other issues that have arisen from the public consultation that will need to be addressed. These are:
  - Label clarity and how this might be achieved, e.g. through guidance or prescription;

- Whether there should be any restrictions in law on how voluntary information should be provided or whether this should be left to market forces;
  - Whether special provisions for small packs should be reviewed; and
  - Other specific policy items such as Country of Origin labelling; ingredient listing for alcoholic drinks; and national labelling 'exemptions'.
27. The above will require further analysis of the consultation responses from last year and discussion with other Government Departments. This will then inform UK input into the Commission working groups intended to be held throughout this year, enabling us to contribute to the shaping of the proposal. Given the number of Government interests, any formal UK policy lines will require cross Ministerial clearance.
28. The Board will be kept informed of these and other work streams associated with the EU Review by means of Intersessional Papers and are asked to indicate those issues in which it has a particular interest.

### **Board Action Required**

29. The Board is invited to:
- **discuss** and **endorse** the proposed labelling principles and consultation (para 4-9);
  - **agree** with the proposal that there are insufficient grounds to change the labelling requirements at EU level for foods sold loose/pre-packed for direct sale (including catering) but that the Agency should monitor consumer information needs for such foods (para 10-15);
  - **agree** that the Agency undertakes some behavioural research in order to test the validity of the proposed principles, noting that such research could cost in the region of £150,000 (para 16-19);
  - **note** the next steps and outstanding issues and indicate those labelling issues in which it has a particular interest (para 24-28).

## Timeline for past FSA Board Discussion of food labelling

Date of Board Meeting / Circulation	Reference	Issue
21 September 2000	FSA 00/04/07	FSA review of food labelling, and the adoption of an 18-point action plan. The Board asked for progress report by March 2001 and interim reports by the CEO in his reports to the Board. Certain aspects of the plan, e.g. GM labelling, has been taken forward and presented to the Board separately.
8 March 2001	FSA 01/02/03	Progress in implementing Action Plan and reporting on the launching of a Food Labelling Forum. The Board noted encouragement at progress made to date and asked for summary of progress to be publicised for consumers. Also asked for origin labelling to be taken as high priority and for the Agency to obtain information from retailers on the voluntary use of origin labelling. The Board asked for a further progress report in November 2001.
14 November 2001	NOTE 01/07/03	Progress in implementing Action Plan, and reporting on the second Food Labelling Forum. The Board noted that the information paper was very comprehensive and helpful and recognised the significant amount of work involved in taking this forward.
14 November 2002	FSA 02/11/02	Progress in implementing Action Plan, and reporting on agreement of new ingredient listing legislation in Brussels and publication of the Agency's guidance notes on origin, clear labelling and marketing terms. The Board noted the paper was well presented with clear indication of progress in many areas. The Board noted the importance of ensuring good two-way dialogue in policy development and welcomed the regular FSA labelling fora. Disappointment was noted at lack of progress on rules on origin labelling but recognised that this was an EU issue which would depend on the Commission's timetable.
12 February 2004	FSA 04/02/05	Progress in implementing Action Plan, and reporting adoption of new EU legislation on ingredient listing/allergen labelling and noting advice to assurance scheme operators. The food labelling forum was noted as a model of best practice for interaction with and listening to a wide range of stakeholders. Some concern was expressed that the review of origin labelling was not due till March 2005 owing to lack of resource. The Board agreed to focus future plans on improving nutrition labelling and further encouraging uptake of the Agency's best practice advice.
11 May 2006	INT 06/05/06	Intersessional paper seeking Board agreement on UK response to EU Commission's consultative document on the review of EU food labelling.
21 September 2006	FSA 06/09/03	Paper seeking Board's view on strategic issue re EU food labelling review. The Board requested the executive establish a set of priorities for food labelling and asked for consideration of consumer research that might be carried out to try and tease out real consumer behaviour.

## PRINCIPLES FOR FOOD LABELLING

### General principles governing all food

Food should be appropriately labelled so as to enable the consumer to make an informed purchasing decision.

Information provided to the consumer should be accurate and easy to understand. It should also be clearly legible and indelible. Products should not be labelled, either by description or pictorially, in such a way as to mislead the consumer as to the true nature or quality of a product.

### Principles governing mandatory provision of information *(in addition to the general principles)*

Mandatory information must be easily identifiable and not be obscured by marketing or other voluntarily provided information. Certain information must be made available to the consumer at the point of purchase. This should relate to:

- **Safety:** This would include the provision of information relating to the durability, use and storage conditions where relevant, to facilitate safe and appropriate handling of the food. The presence of allergens and other ingredients in food that may affect individuals with particular health sensitivities should also be declared, to enable those who need to avoid such substances to do so. This information, in particular, should also be available for the consumer when using the product.
- **Key Product Identifiers:** information relating to the identity and composition of the food, including details of the manufacturer – to facilitate informed choice, comparison between products, fair competition and free trade.
- **Nutrition:** to enable consumers who may wish to do so, including those with special dietary requirements, make healthier choices. (Note this would be in line with current Government policy to help improve public health).
- **Majority Interest/Consumer Demand:** *This would need to be provided for in any development of principles.* In addition to the above principles, there are likely to be issues where the demand from the consumer may be such that mandatory labelling would be appropriate. This would need to be considered on a case by case basis, be evidence based and meet an EU wide need, and labelling may be time limited.

### Principles applicable to foods sold loose, pre-packed for direct sale or in catering establishments

In the case of foods sold loose, pre-packed for direct sale (manufactured/ packaged on the premises where the food is sold) or sold in catering establishments, any mandatory information required by EC legislation must be made available to the consumer at the point of purchase as specified by the competent national authority.

## PRINCIPAL FOOD LABELLING REQUIREMENTS

1. The tables below specify the main current food labelling requirements, together with the most commonly used voluntary information provided by manufacturers and retailers.

### Mandatory

The majority of these requirements only apply to certain foods, and foods containing certain ingredients.

Name	Quinine labelling *
List of ingredients	High caffeine content warning (drinks containing over 150 mg/l of caffeine) *
Allergen information (in the ingredient list)	Sweetener labelling ("with [sugar(s) and] sweeteners") *
Quantity of certain ingredients (QUID) e.g. "Chicken (10%)"	Polyol warning ("excessive consumption may produce laxative effects") *
Net quantity (Weights and measures)	PKU warning ("contains a source of phenylalanine") *
Date of minimum durability ('best before' or 'use by' date)	Packaging gases ("packaged in a protective atmosphere")
Special Storage Conditions/Conditions of use	Raw milk labelling
The name and address of the manufacturer/packer/seller	GMO labelling
Place of origin (if failure to do so might mislead)	Irradiated food labelling ("irradiated" or "treated with ionising radiation")
Instructions for use (if failure to do so might mislead)	Nutritional Panel (where a nutritional claim is made e.g. "low fat") <sup>4</sup>
Alcoholic strength by volume (drinks over 1.2% only)	

### Voluntary (Examples)

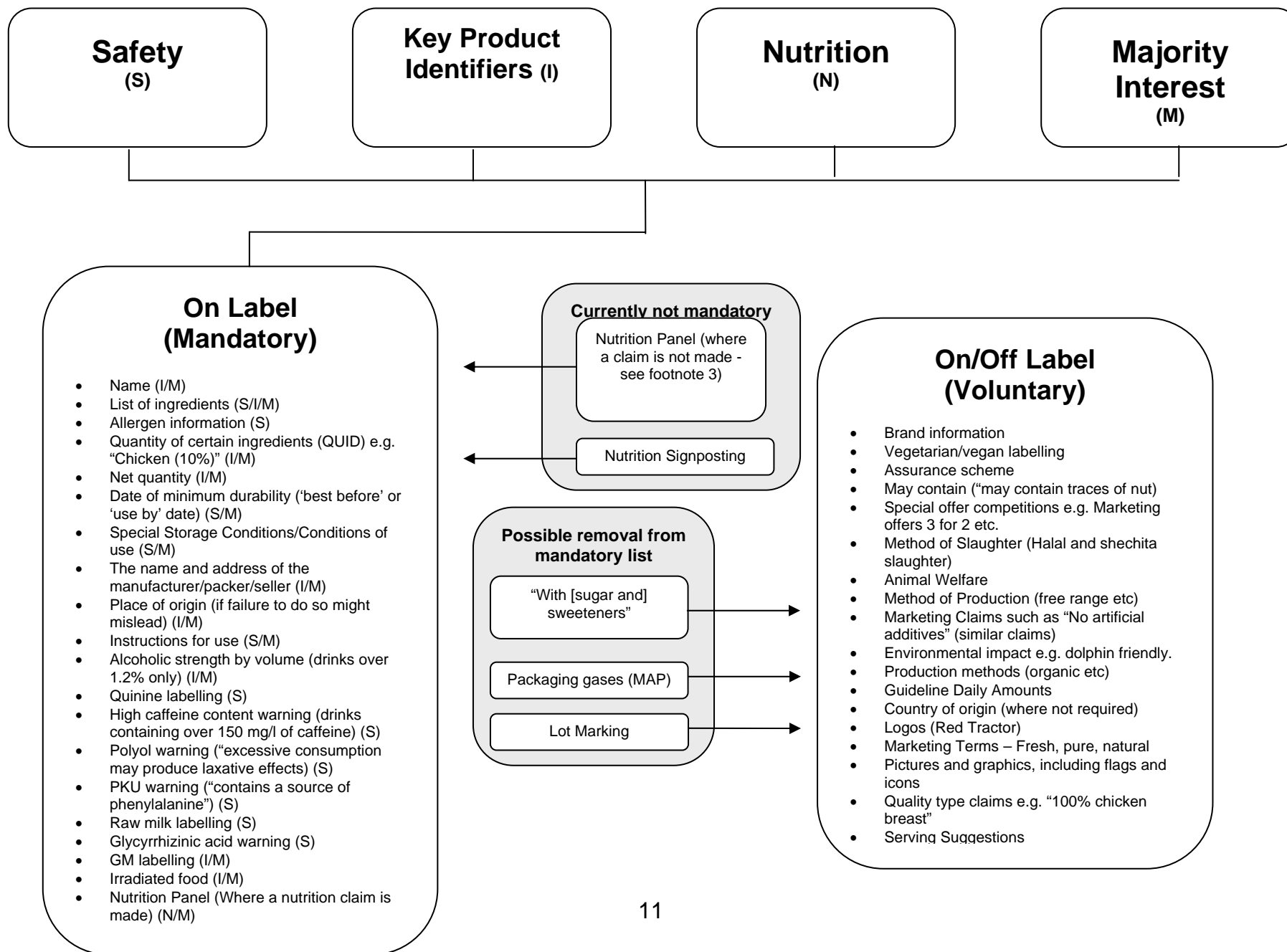
The following is a list of examples of some of the information manufacturers / retailers commonly provide (on label) on a voluntary basis. For some of these there is EC legislation governing their use or otherwise UK guidance available.

Brand information	Environmental impact e.g. dolphin friendly.
Nutrition information (if no claims are made) <sup>3</sup>	Production methods (organic etc)
Nutrition Signposting	Guideline Daily Amounts
Vegetarian/vegan labelling	Country of origin (where not required)
Assurance schemes	Logos (Red Tractor)
May contain ("may contain traces of nut)	Marketing Terms – Fresh, pure, natural
Special offer competitions e.g. Marketing offers, 3 for 2 etc.	Pictures and graphics, including flags and icons
Method of Slaughter (Halal and shechita slaughter)	Quality type claims e.g. "100% chicken breast"
Animal Welfare	Serving suggestions
Marketing Claims such as "No artificial additives" (similar claims)	Method of Production (free range etc)

\* these are examples of "double labelling". The ingredients must be declared in the ingredients list but supplementary wording is also required on the label.

<sup>4</sup> Nutrition labelling is compulsory on pre-packed foods where a nutrition claim is made e.g. "low fat" or "high in fibre", and on foods for particular nutritional uses. Otherwise it is voluntary. In both cases the nutritional information must be provided in the prescribed format in Council Directive 90/496/EEC

## Illustrative example of how the proposed labelling principles could apply to current labelling information



## KEY QUESTIONS CONSIDERED BY THE EXECUTIVE IN ASSESSING RESEARCH ALREADY UNDERTAKEN TO INFORM AN UNDERSTANDING OF FOOD LABELS AND THEIR USE BY CONSUMERS

The following is a list of key questions used to inform the literature review undertaken by the Executive. The numbers in parenthesis refer to the list of literature sources at the back of this document which have been used to answer the questions in the review.

### *General Questions*

#### **1. General label contents and information available elsewhere**

- What information could be available to the consumer (either on the label or elsewhere)? The focus here is primarily on mandatory information, but also separately on voluntary information. (1), (27), (29), (37), (39).
- Could there be information that must be available but does not need to be on the pack?
- What information must be on the label? (20), (23).
- Is there the right amount of information on the label? (23), (33).
  - If there is too much, what need not be there? (20), (23).
  - If there is not enough, what should be added? (23).
  - What is the priority for extra information to be added? (23).
- What information must be on the front of the pack? (20).

#### **2. Misdescription**

- How concerned are consumers about misdescription and authenticity issues? (1), (12), (33).
- Are there views on the standard of accuracy/clarity (excluding print clarity) of the name/description? (No research has been found on this point.)

#### **3. Using labels**

- What is the difference between first time and subsequent/habitual use of a label? (14), (33).
- How much are labels used in the shop (point of sale) and at home (point of use)? (1), (29).
- How does the consumer use the label in making purchasing and other decisions, such as how to use the product and when to use it? (1), (25), (26), (39).
- How much (what %) of the label is used in product recognition? (20).

- In what order do consumers search for information on labels? (14).
- What is most and least used on a label and 2<sup>nd</sup>, 3<sup>rd</sup> etc? (14).
- What do consumers actually use, rather than say would be useful? (14), (32).
- Are consumers overwhelmed with too much detail on labels? (11), (26), (33).
- Do consumers think that information on labels is too complex? (1), (14), (23), (33), (38).

#### **4. Marketing terms**

- Should terms such as 'fresh', 'pure' and 'natural' be legally defined? (4), (7), (13), (17).

#### **5. Off-label information and new technologies**

(No research has been found on this point.)

- How accessible is off-label information?
- Will accessibility change in the future?
- How accessible is information to different social groups?
- How much is, or could, the internet be used for food product information?
- How might new technologies be used in practice, and how acceptable would they be for different groups?
- How would different types of business (retailers, markets, catering, SMEs, etc.) be affected?

#### **6. Effect of packaging/type of product**

- Does the type of food or packaging affect the label in terms of its presentation, contents, ease of use, level of understanding, etc.? (15), (32).
- Are foods bought from butchers or markets (e.g. loose foods) thought about differently in this respect? (5), (36).
- Does the price affect consumer attitudes? (20).

### **Questions relating to specific areas of the European Commission consultation**

#### **7. Voluntary information (e.g. assurance schemes)**

##### **a. Regulate? (11), (40).**

- What is the demand for voluntary information? (8), (9), (11), (20), (33).

## **8. Alcoholic beverages/Alcopops**

### **a. Ingredients listing? (33).**

### **b. Health warnings? (41), (42).**

- Should alcoholic drinks be legally required to provide the same labelling information as other pre-packed foods (i.e. adding an ingredients list)?
- Should ingredients lists on alcoholic drinks relate to (a) what the drink is made from, or (b) what is in the drink after it has been processed and ready for consumption?

## **9. Clarity**

### **a. Font size, contrast, etc.**

- Is there an acceptable minimum font size? (20), (30), (33), (\*IGD).
- What are the main factors affecting clarity? (1), (10), (15), (20), (22), (30).
- Are there any views on the use of colour and symbols? (10), (18), (30), (33).
- Would legislation or guidance on the manner of marking, e.g. print size for mandatory and/or voluntary information be of help? (30).

### **b. Other questions not defined in Commission consultation**

- Would consumers like a mandatory standard panel layout? (20), (33).
- What percentage of the printable area should be devoted to mandatory information? What size and layout should a mandatory panel be? (15).
- What sort of grouping is preferred by consumers? (20).
- Where should the name and description be on the label? (15).
- Questions about evidence from product surveys – also evidence also on what consumers want in terms of emphasis:
  - Is there a link between lack of clarity and the printable area? Do small products face special pressures? (15).
  - How do branded and retailer own brand products compare in terms of clarity, and percentages devoted to mandatory information? What are the pressures faced in terms of marketing, competitiveness? (15).

## **10. Nutrition labelling (38).**

### **a. Mandatory? Extent?**

### **b. Off-label information**

- What are views, levels of understanding? (6), (26).

## **11. Origin labelling**

- Is there an interest in the origin of the product (i.e. where the product is made) and also where the ingredients come from? (2), (3), (24), (30), (33), (37), (39).
- Is there confusion over terms such as 'produce of' and 'produced in'? (2), (3), (16).
- Does origin labelling create confusion over where ingredients came from? (2), (3), (16), (24).
- Should the place of last significant change be better defined? (3), (16), (30).

## **12. Welfare labelling**

- Are there any views on welfare labelling? (23), (30), (31), (33).

## RESEARCH SOURCES AND METHODOLOGIES

**Note:** Not all of the documents listed arise as sources that answer the questions which have been drafted for the purposes of the literature review.

### ***FSA commissioned research***

1. *Consumer Attitudes to Food Labelling* (IPSOS-RSL, commissioned by MAFF), February 2000.

Sample of 1,081 interviews lasting 40 minutes each.

2. *Confusion Regarding Food Labelling in Britain* (MORI), February 2000.

Questions placed on MORI's "omnibus", a nationally representative sample of 2,092 adults aged 15+, interviewed across Great Britain across 156 constituency based sampling points.

3. *Importance and Impact of Country of Origin of Food* (MORI), February 2000.

Preliminary qualitative phase consisting of four representative focus groups conducted in January 2000. For the quantitative phase, questions were placed on MORI's omnibus and a representative sample of 2,017 adults aged 15+ was interviewed across GB in February 2000.

4. *Better Food Labelling Initiative – Written Responses* (FSA), July 2000

Summary of written responses received during the "Better Food Labelling Initiative".

5. *Consumer Information Needs for Food Sold Through Catering Outlets and Loose Foods - Summary Report* (MORI), September 2000.

Initial qualitative stage using four focus groups, plus one group of people with allergies. Quantitative stage of questioning sample of 1,026 adults.

6. *Nutrition Labelling – Qualitative Research* (Conway Smith Rose), November 2001.

12 trios and 20 depth interviews with people that use nutritional labelling and are interested in healthy eating (including people with special dietary needs.) The sample is therefore not representative of the entire population. Eight labelling options were considered and "contextual issues" were also discussed.

7. *Fruit Juice Labelling Research Report* (Sample Surveys Research Group), April 2002.

318 interviews with 17 mini-depth interviews were conducted amongst consumers who had already taken part in the quantitative research.

8. *'May Contain' Labelling – The Consumer's Perspective* (The Anaphylaxis Campaign), May 2002.

Shopping basket comparison of 127 items and study of labelling on set of 254 items.

9. *Consumer information needs regarding pesticides* (COI Communications), August 2006.

Qualitative research. 8 extended creative discussions with participants divided into groups of: Avoiders, mainstream and disconcerners. Followed by fifty-six 30 minute interviews with mainstream consumers and 10 one hour interviews with disconcerners.

10. *Nut Allergy Labelling* (COI Communications), December 2002.

21 in-depth interviews with people with nut allergies and three discussion groups of six were conducted with people who regularly shop on such allergy-sufferers' behalf.

11. *Bamboozled, Baffled and Bombarded – Consumers' views on voluntary food labelling* (National Consumer Council), February 2003 (Survey work carried out in September/ November 2001.)

Shopping survey (8 "major high-street retailers and 2 independent shops), qualitative research and meeting with "key stakeholders".

12. *Consumer Attitudes to Food Misdescription – Quantitative Research* (Define), July 2003.

Interviews with UK consumers (male/female aged 18-70, BC1C2DE social classes, including ethnic minorities Afro-Caribbean, South Asian Muslim and Hindu).

13. *Survey Report: An Investigation of the use of Terms such as Natural, Fresh etc in Food Labelling* (Food Labelling and Standards Division, FSA), February 2004.

Survey project managed by the Association of Public Analysts. Survey of 220 products, the labelling of which included one or more of the terms covered by

the guidance (NB fruit juices were excluded from the survey – see above for separate survey)

14. *FSA Consumer Attitudes Survey, 2006.*

2,649 consumers questioned.

15. *An Assessment of the Uptake of Food Standards Agency Guidance on Clear Food Labelling (CCFRA), November 2005.*

400 foods from 60+ supermarkets and stores were assessed on 70 criteria. Individual product assessments were sent to the relevant brand holders, with an invitation to comment on the findings.

16. *An Assessment of the Uptake of Food Standards Agency Guidance on Country of Origin Labelling (CCFRA), November 2005.*

400 foods from 60+ supermarkets and stores were assessed on 36 criteria. Individual product assessments were sent to the relevant brand holders, with an invitation to comment on the findings.

17. *Marketing Terms Report of Findings (Synovate), November 2005.*

10 x 2 hour focus groups followed by a sample of 800 in order to provide 370 ratings per term.

18. *Quantitative Evaluation of Alternative Food Signposting Concepts (Synovate), November 2005.*

Sample of 2,676 consumers constituting a representative sample of 16-70 year olds.

19. *Qualitative Signpost Labelling Refinement Research (Synovate), November 2005.*

16 x 2 hours focus groups with 7-9 consumers conducted amongst consumers with main/joint responsibility for the household food shopping, aged 18+. Research conducted across the UK and across social groups.

20. *Food Labelling Requirements – Qualitative Research, Final Report (Define), August 2006.*

10 x 2 to 3 hour workshops with 8-10 consumers across a range of locations in the UK.

## ***Research commissioned by other Member States***

21. *Strategic Task Force on Alcohol – Interim Report* (Ireland), May 2002.

Conclusion taken from the transcript of a presentation by Professor Robin Room of the Centre for Social Research on Alcohol and Drugs of Stockholm University, which is at Annex B in the report.

22. *Report of the Food Labelling Group* (Department of Agriculture and Food, Ireland), December 2002.

Research conducted by FSAI with a base of consumers aged 15+.

23. *Consumer Attitudes to Food Safety* (Millward Brown Irish Marketing Surveys Ltd. for Food Safety Authority of Ireland), October 2003.

Both qualitative and quantitative research conducted. Qualitative consisted of 10 group discussions and 6 accompanied shops. Quantitative research consisted of 800 telephone interviews with consumers aged 15+ from a nationally representative sample.

24. *Food Labelling Research Undertaken on Behalf of the Consumer Liason Panel, S3-074* (Research Solutions, Ireland), December 2003.

Representative base of 802, conducted face-to-face in consumers' own homes with consumers aged 18+. Survey conducted between 13 October and 3 November 2003.

25. *Quantification: proportion of consumers who understand selected important labelling information* (LUI Marknadsinformation AB for Swedish Food Administration), 2006.

This survey used the "GfK" national omnibus. 1,000 interviews were carried out with a target group between ages 15 to 74.

26. *Desk Research Report on Labelling for Dutch Ministry of Health, Welfare and Sport* (Schuttelaar & Partners), June 2005.

This is a literature review of consumer research conducted on food labelling in the EU.

27. *Consumer Knowledge and Attitudes towards GMOs in Food* (Forbruger Radet, for Danish Consumer Council), 2006.

Representative base of 816, survey conducted by "Marketminds". Consumers interviewed between 18 October and 2 November 2005.

28. *(This reference is assigned to French Government research that the Agency has requested and is currently awaiting.)*

29. *What Consumers Want to Know*, EMNID Survey, 2004.

This is an empirical study on consumers' information needs written by Prof. Dr. Edda Muller, published in Berlin 2004.

30. *Quantitative Research conducted in Nordic Countries (Sweden, Norway, Denmark, Finland and Iceland)* (Synovate Temo), October 2006.

Telephone survey carried out with 1,000 interviews in each Nordic country through the format of an omnibus. The sample was randomly selected from consumers over the age of 16. Interviews were conducted between 16 and 26 October 2006.

### ***Mintel Research***

31. *Food Labelling* (Mintel), May 2003.

Consumer research, broken down into lifestages, the standard socio-economic scale, and ACORN categories. Results referred to in this document are taken from the Great Britain Target Group Index (TGI) of about 25,000 adults.

32. *Food Packaging* (Mintel), May 2003.

As above. The particular results referred to above are taken from a base of 968 consumers aged 15+.

### ***European Commission Research***

33. *European Consumers' Attitudes Regarding Product Labelling – qualitative study in 28 European countries* (OPTEM commissioned by DG Sanco), 2005.

### ***Other Documents Reviewed***

34. *Institute of Grocery Distribution (IGD) Guidance, Packaging Legibility Recommendations for Improvement*, July 2003.

The guidelines focus on how to improve clarity of information provided to the consumer, not the information content.

### 35. Food Labelling Forums

The Agency set up these stakeholder events to hear consumer views on a range of labelling issues and to inform consumers, industry and enforcement of the Agency's labelling policies.

### 36. Summary of responses to consultation on: Draft Voluntary Guidance on the Provision of Allergen Information for Foods that are not Prepacked.

Sets out responses to Agency consultation on voluntary best practice guidance that can help make establishments selling or providing non-prepacked foods to consumers, aware of the potential problems associated with food allergy and intolerance.

### 37 Cheftel, J.C., *Food and nutrition labelling in the European Union*, Food Chemistry, Vol. 93(3) (2005), pp. 531-50.

Article from peer-reviewed journal.

### 38 Przyrembel, H., *Food labelling legislation in the EU and consumers' information*, Trends in Food Science & Technology, 15 (2004), pp. 360-65.

Article from peer-reviewed journal.

### 39 Sloan, E., *What Consumers Want – and Don't Want – on Food and Beverage Labels*, Food Technology, Vol. 57(11) (2003), pp. 26-36.

Monthly publication of *Institute of Food Technologists*, a "scientific and educational society serving the food science and technology field."

### 40 Rayner, M. *et al*, *Consumer Use of Health-Related Endorsements on Food Labels in the United Kingdom and Australia*, Journal of Nutrition Education, Vol. 33(1) (2001), pp. 24-30.

Research funded by the British Heart Foundation.

### 41 Stockley, C., *The effectiveness of strategies such as health warning labels to reduce alcohol-related harms – an Australian perspective*, International Journal of Drug Policy, 12 (2001), pp. 153-66.

"...a forum for the dissemination of current research, reviews, debate, and critical analysis on drug use and drug policy in a global context."

### 42 *Drinking: adults' behaviour and knowledge in 2006* (UK Office of National Statistics, Omnibus Survey Report No. 31), November 2006.

An omnibus survey of 2,474 UK adults over the age of 16. Research was conducted in February and March 2006.