



*The European Consumers' Organisation*

**BEUC/X/044/2006**

12 July, 2006

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# Discussion Group on Simplified Labelling: Final Report

*Simpler labelling for healthier choices*



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## Final Report of the Discussion Group on Simplified Labelling

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## Executive Summary

The recent proliferation of many different simplified labelling schemes, whilst being a genuine attempt by commercial operators to assist their customers, is not helping all consumers to make the healthy choice the easy choice. BEUC, the European Consumers' Organisation, with the support of Dorette Corbey MEP, organised a multi-stakeholder discussion group with the aim of:

- discussing commonalities and differences of the many simplified labelling systems currently developed or under development throughout Europe;
- collating and analysing the research which underpinned them; and
- collating and analysing the available evaluation data.

The group was presented with information relating to a number of research studies - partly published and partly presented for the first time - carried out on different simplified labelling schemes in the UK, France, Sweden, the Netherlands, Denmark, Italy and Germany. These studies included those carried out by the UK Food Standards Agency (FSA), the French Ministry of Agriculture (DGAL) and French consumer organisation (CLCV), Unilever, ASDA/Walmart, Sainsbury's and Tesco. Additional data considered by the group were submitted by the European Food Information Council (EUFIC), McDonalds and the European Heart Network (EHN).

The main limitation of the available research and data is the fact that little *real life* performance testing in the shopping environment has been carried out. In addition, where quantitative research has been carried out, in the majority of cases, *perceived performance* of simplified labelling schemes has been tested rather than *actual performance*.

All research shows support among consumers for a front of pack simplified labelling system and the need for any scheme to be endorsed by a credible independent body. A number of studies have reported consumers reacting favourably to simplified schemes which include the use of colour coding of levels of nutrients to help make sense of numerical information (Asda, Sainsbury's, FSA, CLCV/DGAL). Some studies (Asda, FSA, EUFIC, Unilever) have highlighted difficulties in consumers being able to use correctly various forms of numerical information (i.e. GDAs, percentages, bar charts, grammes).

Some preliminary sales data were provided by two UK retailers, Tesco (percentage GDAs) and Sainsbury's (colour coding), and by the Swedish retailer ICA (Keyhole). Initial sales data suggest that all schemes are having significant and comparable effects on sales. However, because we do not have enough detail on the methods by which the figures have been arrived at, and because the figures have been obtained in different ways, we are unable to draw any firm conclusions at this stage.

The group<sup>1</sup> agreed that:

- an EU-wide simplified labelling scheme will help consumers from all backgrounds choose a healthy diet by providing them with at-a-glance information on the nutritional content of foods;
- an EU-wide simplified labelling scheme should constitute an incentive not only for consumers to choose healthy food but also for producers to reformulate the products on the market in favour of healthier options;
- such a scheme should be on the front of the pack and in addition to nutrition information provided on the back of pack;
- there is a clear need for such a scheme to be endorsed by a credible independent body;
- the development of such a scheme requires agreement on both a clear format and a set of underpinning nutritional criteria;
- the EFSA might have an important role in the development of the criteria in consultation with stakeholders;
- the format of such a scheme should be based on robust consumer research as to what is most effective and easy to understand for consumers. DG SANCO should take this forward in conjunction with stakeholders;
- an EU-wide simplified labelling scheme should not require intensive education but should be supported by simple and consistent information from national authorities, manufacturers, retailers, consumer organisations and the media;
- an EU-wide simplified labelling scheme should be introduced as part of a broader EU strategy to tackle obesity and diet-related disease;
- there is a need for well-planned and consistent evaluation of the performance of simplified labelling to better understand how it is used by consumers.

The development of a front of pack simplified labelling scheme should take the following considerations into account:

- the use of colour coding of levels of nutrients as an interpretative element to make sense of numerical information appears to be a promising way forward, based on the research considered by the group;
- consumers would not benefit from having a large number of nutrients on the front of the pack. The nutrients to be taken into account should be based on public health priorities and consumer research and include total fat, saturated fat, sugars and salt;

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<sup>1</sup> With the exception of Unilever, see disclaimer on Page 8

- in the context of providing overall nutrition information, the suggestion of a simple system merely providing information about the energy content of the food was considered too limited;
- although no consensus was reached on whether a front of pack simplified labelling scheme should be based on information per 100 g or per serving, there was general agreement that a combination of the information per 100g and per serving would allow the consumer to make a quick assessment of the nutrition content of the food and compare different products;
- Interpretative logos or symbols (e.g. the Swedish keyhole) could co-exist with other forms of simplified front of pack labelling but the group did not consider in sufficient detail the available research on this labelling option.

**Disclaimer**

Unilever agrees that a simplified front-of-pack labelling scheme can be very helpful to consumer in choosing a better balanced diet and supports efforts to develop and harmonise them.

Unilever however feels that it is too early to define a front-of-pack labelling scheme too narrowly and can not subscribe to the conclusions relating to the development of a front-of-pack simplified labelling as they are formulated in the executive summary.

Unilever believes that current European research at this point in time provides not enough evidence to make a clear recommendation on how a front-of-pack labelling scheme should be construed in detail and it is therefore premature to focus on one specific model which may be appropriate in one country, but may not be fully understood in others.

Unilever does believe that interpretative logos such as the Swedish keyhole or the Dutch 'Ik kies bewust logo' could be valuable alternatives. These interpretative logos take into account existing research on and experience with Nutrient Profiles. EFSA will in the very near future thereby providing a European platform.

## Introduction

As clearly described in the briefing paper prepared by the International Obesity Task Force for the EU Platform<sup>2</sup> a marked trend towards increasing levels of overweight and obesity can be found throughout Europe. Too many European consumers suffer the consequences of a bad diet and insufficient levels of physical activity. In many EU countries more than half the adult population is overweight and 20-30% of adults are categorised as obese. If current trends continue, two out of three Europeans will be overweight or obese by 2030.

It is commonly agreed that the solution to this multi-factorial issue should be the combination of a number of initiatives and activities in many different areas. Better and more consistent information to consumers on what is a healthy diet, including more understandable nutrition information on products, is just one of the different areas to be developed in the consumer and public health interest and front-of-pack simplified labelling is the focus of this report.

Many food companies and some governments have taken the initiative to develop better and more simplified ways of communicating nutritional information to consumers. However the different ways in which the information is presented has meant that it is not easy for consumers to use the information easily to compare the nutritional qualities of competing foods from different manufacturers and or retailers.

A great deal of research is being carried out to assess different ways of providing simplified nutritional labelling. It has to be noted that although this work is immensely valuable it could result in differing approaches to simplified nutritional labelling.

BEUC, the European Consumers' Organisation, with the support of Dorette Corbey MEP, organised a multi-stakeholder discussion group with the aim of:

- discussing commonalities and differences of the many simplified labelling systems currently developed or under development throughout Europe;
- collate and analyse the research which underpinned them; and
- collate and analyse the available evaluation data relating to the impact of simplified labelling schemes already available on the market on consumer food purchases through retail outlets.

The Discussion Group worked according to the principles stated in the Terms of Reference (Annex A), for a period of five months, with meetings planned between March and July 2006.

All documents discussed and produced in the working group, including the agendas and minutes of the meetings, were posted on BEUC's website<sup>3</sup> and third parties had the opportunity to submit to the BEUC secretariat comments

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<sup>2</sup> International Obesity Task Force for the EU Platform briefing paper

[http://ec.europa.eu/health/ph\\_determinants/life\\_style/nutrition/documents/iotf\\_en.pdf](http://ec.europa.eu/health/ph_determinants/life_style/nutrition/documents/iotf_en.pdf)

<sup>3</sup> [www.beuc.org](http://www.beuc.org)

or material for consideration. Documents were submitted and/or material presented to the group by Tesco, Sainsbury's, Mc Donalds<sup>4</sup>, the European Food Information Council (EUFIC)<sup>5</sup> and the European Heart Network (EHN)<sup>6,7</sup>.

### **Current situation across Europe, the consumer's perspective**

As part of its nutrition campaign<sup>8</sup>, launched in March 2005, BEUC made seven demands:

- Nutrition must be explicitly considered in other EU policies;
- Consumers must have good information about what is a healthy diet;
- *The nutritional information available on products must be clearer;*
- Some products must not be promoted as healthy;
- All consumers must have access to healthy, affordable products;
- Manufacturers, retailers and caterers must reduce fat, sugar and salt levels in foods; and
- Marketing to children of foods high in fat, sugar and salt must be restricted.

Also as part of its campaign BEUC published a position paper on simplified labelling<sup>9</sup> and a study on consumers' attitudes to food labelling<sup>10</sup>. This study, which was published on 1 September 2005, was carried out in five European countries (Germany, Denmark, Spain, Hungary and Poland) where 3000 consumers were interviewed. The study showed that the percentage of interviewees wanting nutritional information on the labels is very high (around 80%) and even a sizeable percentage of consumers who declared not to be very interested or not to be at all interested in nutrition would like to see a nutrition indicator on food packaging (56% and 39% respectively). It is generally agreed that an EU-wide simplified labelling scheme should help consumers make healthy choices more easily, be part of the imminent review

<sup>4</sup> McDonald's Nutrition Information Initiative, Research report prepared for McDonald's Europe by 2CV:Research, Nov 2005; and

Development of European Guideline Daily Amounts (GDAs) for use in consumer nutrition information systems and food profiling, Nov 05

<sup>5</sup> EUFIC research on labelling

Phase 1: Getting insights on consumer understanding of nutrition information on food labels motivational aspects. EUFIC Forum 2: <http://www.eufic.org/gb/heal/heal12.htm>

Phase 2: Identifying the potential of a number of on-pack nutrition communication concepts to engage consumers and help them understand nutrition information on food labels. EUFIC Forum 3 (which will be published on the website before the end of June, so till then it is confidential), attached document

Peer review article (submitted to the scientific journal *Appetite* early in July 06)

Phase 3: Systematic review of consumer understanding of nutrition information on food labels in Europe since 2003. Ongoing work with Prof. Klaus Grunert from Aarhus School of Business. Key line findings to be presented in the 1st Public Health Nutrition congress, Barcelona, Sept 06.

<sup>6</sup> Cowburn G, Stockley L (2003) A systematic review of the research on consumer understanding of nutrition labelling. European Heart Network: Brussels

<sup>7</sup> Cowburn G, Stockley L (2004) Consumer understanding and use of nutrition labelling: a systematic review. *Public Health Nutrition* 8 (1): 21-28.

<sup>8</sup> European consumer organisations invite you to choose our menu, BEUC Nutrition Campaign Brochure X/010/2005

<sup>9</sup> BEUC Position Paper on Simplified Labelling BEUC/X/010/2006

<sup>10</sup> BEUC Study on Consumers' perceptions of labelling of foodstuffs BEUC/X/032/2005

of the nutrition labelling directive and be in addition to mandatory back-of-pack nutrition labelling on the big eight.

It is generally agreed that the recent proliferation of many different simplified schemes is not helping consumers make the healthy choice the easy choice and it is worrying that there is no agreed common scientific basis for the different schemes already in place or currently under development and the work of different food companies and national authorities is not co-ordinated.

The current schemes can be roughly classified into three types:

- health marks (including health ticks and healthy eating logos) (Fig 1);
- interpretative colour coded schemes (Fig. 2); and
- numerical GDA and percentage GDA schemes (Fig. 3).

Fig. 1 Examples of health marks

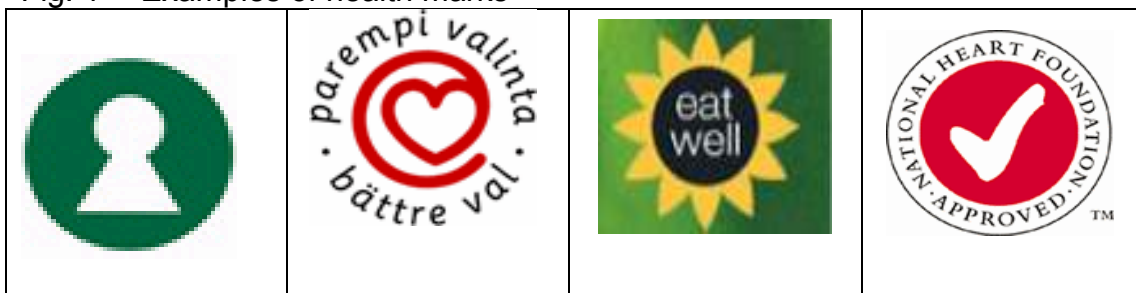


Fig. 2 Examples of colour coded schemes



Fig. 3 Examples of GDA and percentage GDA schemes



The healthy eating logos are symbols which give an overall assessment of healthiness of a food; the colour coded schemes are symbols which give information on key nutrients with an interpretative element and use colour as a guide to whether the levels of the nutrients are high, medium or low; the GDA based schemes provide numerical information on actual amounts of key nutrients and relate this information to GDAs using percentages and/or bar charts.

It is important to look at the merits of different systems and agree on what is best for consumers, not what they like most but what is most likely to help them switch to more balanced diets.

### **Current projects in the countries represented on the group**

In a number of European countries, national authorities, food companies, retailers, public health bodies and consumer organisations have been discussing, either in formal meetings/workshops or informally, ways of providing consumers simplified nutrition information. Below is an overview of the different initiatives with regard to simplified labelling in Denmark, the Netherlands, France, Sweden and the UK.

#### **Denmark**

The Danish proposal, which has not yet been adopted by the food industry, is based on the classification of all foods in ten food groups (Dairy products, Cheese, Meat, Fish, Pastry, Fruit and vegetables, Ready-prepared dishes, Fats, Beverages, Desserts/Snacks). Dietary intake data from the national dietary survey were modelled to a diet that fulfils the official Danish dietary guidelines and nutrient recommendations. In this way all foods were ranked in relation to their influence on the total diet. The ranking was used to place all foods from each food group in three categories based on their content of selected nutrients (fat, saturated fat, and - when relevant – added sugar and fibres). The selection of these nutrients is explained by the fact that the average Danish diet contains too much fat (especially saturated fat) and sugar and not enough dietary fibres, whereas the content of micronutrients in general fulfils the Nordic Nutrition Recommendations. The three categories were designated “Most”, “Little”, “Less”, symbolising the relative quantity of the food that can be eaten within a healthy, varied diet. The comparison of foods from different categories should mainly be seen within food groups but comparison can be made between food groups.

A graphic symbol to be displayed front-of-pack, illustrating the three categories is being developed, and will be tested in consumer studies.

Some improvements to this system have been proposed, for example including salt/ sodium in the classification profiles.

A scientific paper about the nutrition profiling model has been submitted for publication in Scandinavian Journal of Food and Nutrition.

## The Netherlands



Fig. 4 - Dutch 'Ik kies bewust = My Choice' symbol

An action proposed and promoted by the Dutch government is signposting on food products. Industry is encouraged to develop a uniform system on the basis of self-regulation. The authorities are in favour of a uniform system and have therefore asked the Dutch federation of the food industry (FNLI) and the Dutch federation of food trade (CBL) to develop such a system and logo. The Dutch Ministry of Health intends to play a supportive and coordinating role rather than proceed to legislative action. Although the FNLI, as a whole, could not come to an agreement on a system that would cover all food categories, three large food and beverage manufacturers proceeded to develop a system with a single logo. In May 2006 a healthy choice logo (in Dutch 'Ik kies bewust') was presented to the Dutch minister of Health (Fig. 4). This initiative was immediately supported by some major retailers and caterers, as well as the Dutch Consumer Organisation and the Netherlands Nutrition Centre.

To qualify for the logo a product would have to meet two criteria:

- levels of trans fat, saturated fat, sodium and sugar have to fit criteria derived from national and international guidelines, including those from the joint FAO/WHO expert consultation on diet, nutrition and the prevention of chronic diseases<sup>11</sup>.
- Products would have to meet the preferred or 'middle road' criteria of the classification system developed by the Netherlands Nutrition Centre. This system, known as "The Netherlands tripartite classification model for foods"<sup>12</sup> is intended for nutrition information and fits in with both scientific insights pertaining to a healthy diet and the way of thinking and daily practices of consumers. The system departs from classification of the whole food assortment into product groups. The classification is done looking at the amount of fibre, saturated fat, energy and/or specific micronutrients contained in the food product.

<sup>11</sup> Joint WHO/FAO Expert Consultation on Diet, Nutrition and the Prevention of Chronic Diseases (2003): Diet, Nutrition and the Prevention of Chronic Diseases. WHO technical report series 916. Geneva, Switzerland.

[http://www.who.int/hpr/NPH/docs/who\\_fao\\_expert\\_report.pdf](http://www.who.int/hpr/NPH/docs/who_fao_expert_report.pdf)

<sup>12</sup>The Netherlands tripartite classification model for foods by the Netherlands Nutrition Centre. <http://www.voedingscentrum.nl/NR/rdonlyres/0AF85A19-79B1-4DB5-A0E8-C8BFFD44B089/0/Criteriaengelssite.pdf>

The Dutch government supported this industry initiative under condition that it is an open initiative and other manufactures, retailers, etc. can join, and that the criteria are developed further on a scientific basis, subjected to tests by the Health Council of the Netherlands, and that effects are monitored.

### France

The French authorities have been intensively working for a year on the issue of nutritional labelling and profiles to inform consumers' choice. In France several models were tested by the CLCV-DGAL study and the results were published at the end of June. The French authorities have developed a list of nutrients it considers should be labelled: carbohydrates including simple sugars, fat including saturated fat, proteins, salt, trans fatty acids, isoflavones for soy-based foods. The three main macronutrients (carbohydrates, fat, proteins) are labelled to help consumers to balance their diets on the recommended energetic contribution of each macronutrient. The other nutrients, i.e. simple sugars, saturated fat, salt, trans fatty acids, isoflavones, would also need to be labelled because epidemiological and physio-pathological data exist in France which show a link between the consumption of these nutrients and health. Another facultative list could label other nutrients such as vitamins and minerals.

### Sweden



Fig. 5 - Swedish Keyhole symbol

The Swedish keyhole system (Fig. 5) has been in use in Sweden since 1989 and is a registered trade mark in all European countries. This scheme has tried to unify in one logo the multitude of symbols that existed in the past and still exist in reduced scale. The keyhole symbol means that a product contains high levels of fibre, low levels of fat and sugar and low levels of salt. The symbol interprets the nutritional guidelines that the Nordic Ministry Council has agreed on. Some product categories are excluded (e.g. ice cream, chips, biscuits) from the scheme independently of their nutrition profile.

A survey conducted by ICA in Sweden observed that the introduction of the keyhole system resulted in changes in buying habits. When asked whether or not they understood the keyhole system the majority of consumers replied that they did. This survey confirms the results of an interview study that the Swedish Food Authorities carried out in 2003 concerning Swedish households buying habits, knowledge about the keyhole and importance of change in food habits. Only 2 % of the consumers didn't recognise the symbol and most customers associated the symbol with low fat content<sup>13</sup>.

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<sup>13</sup> References to consumer studies in Sweden and the importance of the keyhole label

When the keyhole was introduced as an intervention study<sup>14</sup> in the north of Sweden the result was most encouraging. Both blood cholesterol levels and blood pressure dropped in the population and the results are still evident.

The use of the Keyhole scheme has provided an incentive for product development. For example, between 2001 and 2004 an increase of about 40% in sales of keyhole labelled cheeses was recorded and one out of eight cheeses now contains less than 17% fat. In 2004, 29 out of 30 of the most popular dark breads were keyhole-labelled. At ICA the keyhole products account for about 8% of ICAs total sale (both food and non-food).

## UK

The Food Standards Agency has been working to develop a front of pack signposting scheme<sup>15</sup>, <sup>16</sup> which:

- helps consumers make informed choices and construct a balanced diet;
- allows consumers to quickly and correctly identify whether a product is a healthier option or one high in fat, salt or sugar;
- helps consumers to make comparisons between products, by quickly identifying which is the one lower in fat, salt or sugar and which is higher;
- is easy and clear to understand; and
- is applicable to as wide a range of consumers as possible (particularly with respect to age, socio-demographic group and ethnic group)

On 9 March 2006 the Food Standards Agency Board agreed that a voluntary front of pack signpost labelling scheme should be applied in the UK to highlight the levels of fat, saturated fat, sugar and salt in complex processed foods.

The Agency's Board recommended that front of pack signpost labelling system should be based on the following four core principles:

- Provision of information for fat, saturated fat, sugar and salt;
- Use of red, amber, green colour coding to indicate at a glance whether the level of individual nutrients is high, medium or low,
- Information on the level of each nutrient present in a portion of the product; and
- Use of nutritional criteria developed by the Agency.

This core principles approach provides consistency while facilitating businesses in tailoring their labelling to fit their customers needs.

<sup>14</sup> Norsjöprojektet – en svensk modell för lokalt folkhälsoarbete, 1999

<http://bmj.bmjournals.com/cgi/content/full/315/7108/582>

<sup>15</sup> Quantitative Evaluation of Alternative Food Signposting Concepts – Results of Consumer Research conducted on behalf of FSA - Nov 2005

<http://www.food.gov.uk/multimedia/pdfs/signpostquanresearch.pdf>

FSA information aimed at helping consumers using signposting wisely:

<http://www.eatwell.gov.uk/foodlabels/trafficlights/>

Additional information on signpost labelling can be found at:

<http://www.food.gov.uk/foodlabelling/signposting/>

<sup>16</sup> The first phase of information aimed at the consumer can be viewed at:

<http://www.eatwell.gov.uk/foodlabels/trafficlights/>

The Board recommended that front of pack signposting be applied to the following processed foods:

- Breakfast cereals (except products which only contain oats)
- Ready meals (including prepared dishes sold with and without accompaniments such as rice, noodles, vegetables, potato or similar)
- Burgers, sausages and pies
- Breaded, coated or formed meat, meat alternative, poultry, fish and similar products
- Pizzas
- Sandwiches

In taking this view the Board noted that the potential added benefit to consumers of applying the scheme more widely would vary across product categories and that it may provide no added benefit to consumers in areas where there is clear advice to eat more of, such as for fresh fruit and vegetables.

The Board did not choose a specific design format for front-of-pack simplified labelling, preferring to encourage industry to innovate to develop designs tailored to meet their customers needs. This might involve providing additional information on Guideline Daily Amounts (GDAs) and / or calories as this might be helpful for some consumers. Both Sainsbury's and Waitrose have already adopted the Agency's approach on a range of products. CO-OP, ASDA and a number of other companies are expected to follow shortly.

The Agency is in the process of finalising the nutritional criteria which underpin its approach to signpost labelling and the accompanying technical guidance for industry on how to apply the Agency's recommended front of pack signpost labelling approach.

The Agency is continuing to work with stakeholders to promote awareness and understanding of the four core principles approach and to encourage businesses to use it and will continue to highlight concerns about aspects of schemes that are not considered to be in the consumers interest. It is also working with adopters to develop a consistent approach on consumer advice based around core messages<sup>17</sup>.

The Agency is also considering with stakeholders how best to secure an independent assessment of the impact of signpost labelling schemes on consumer behaviour.

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<sup>17</sup> The first phase of information aimed at the consumer can be viewed at: <http://www.eatwell.gov.uk/foodlabels/trafficlights/>

## Research carried out on different simplified schemes and how different research methodologies compare

Several research studies have been conducted to date by different companies and countries exploring front of pack nutritional signposting. Some of the most recent research on consumer preferences and understanding of different simplified labelling schemes was published by the FSA in the UK and by CLCV-DGAL in France. Some manufacturers and retailers have also undertaken their own consumer research. Unilever conducted a study to compare consumers' attitudes towards different simplified labelling schemes. Tesco, Sainsbury's and ASDA carried out qualitative/quantitative studies to assess consumers' preferences with regard to different ways of displaying simplified front-of-pack nutrition information.

This part of the report seeks to examine the research conducted, compare methodologies used, and identify whether any preliminary conclusions can be drawn on what type of scheme may be most effective.

Below are a description of the studies presented to the discussion group and a summary of their conclusions, more detailed information on the different methodologies used is available in Annexes D1 to D6.

### Research methodologies

The group agreed that market research to be used as evidence should be:

- Conducted by a recognised independent research organisation
- Robust
  - Any quantitative research should be based on a sufficiently large sample size to allow for statistical analysis and any differences quoted should be *statistically significant*. A survey result can be said to be statistically significant where it seems unlikely to have come about merely as a consequence of a sampling error. In market research, statistical significance is generally used at a 95% confidence level. This means that if independent samples are drawn from a population, a difference of the same magnitude or greater would be expected 19 times out of 20 therefore there is only a likelihood of 1 in 20 (5%) that the difference occurred by chance.
  - Sampling – sampling in quantitative research should be 'representative' of whomever the research needs to cover. In the case of research into nutritional signposting, samples should be as representative of the population as possible as nutritional signposting should be applicable and accessible to all. Samples should be large enough to allow for separate analysis of sub-groups to highlight whether particular issues exist for specific groups (e.g. those from lower socio-economic groups). Whilst qualitative research cannot be claimed to be 'representative', nevertheless, samples should aim to be inclusive of all groups appropriate to the research.

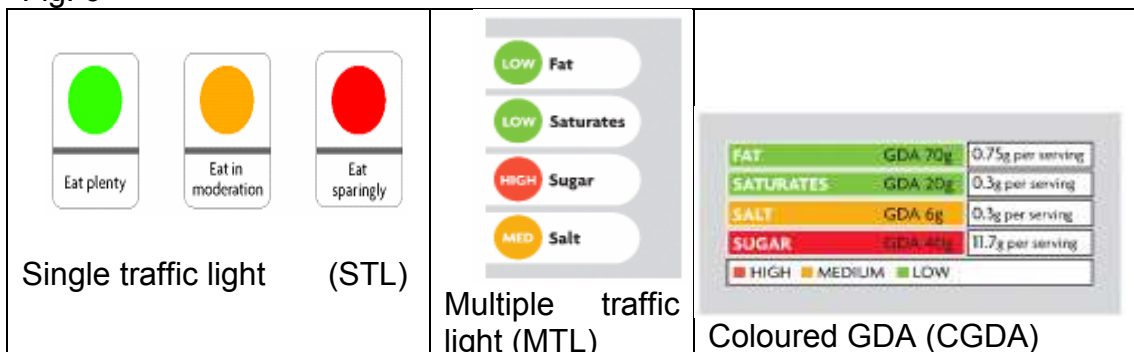
- Balanced – any questionnaires or discussion guides used in research should be designed and administered in such a way so as to elicit as ‘true’ a response as possible from respondents and avoid leading them to a particular response.
- Aiming to evaluate *actual performance*<sup>18</sup> and not simply *actual understanding*<sup>19</sup> or *perceived performance*<sup>20</sup>.
- Peer reviewed and published in detail.

## Research studies

### FSA

In the UK the Food Standards Agency has researched ten different schemes with consumers over an 18 month period to understand their preference and comprehension of different front of pack signpost labelling symbols. Two different approaches had been tested (symbols which gave an overall assessment of the healthiness of a food and signposts which gave information on key nutrients - fat, saturated fat, salt and sugar with an interpretative element). Executions which included traffic light colours (red, amber and green colours) to indicate whether the nutrient levels were high, medium or low as well as executions which included GDA information and the amount of nutrients in a serving were also tested (Fig. 6).<sup>21</sup>

Fig. 6



A quantitative study was carried out with more than 2,500 UK consumers to test the performance of the most promising simplified labelling schemes

<sup>18</sup> *Actual performance* can only truly be seen once schemes are operating in the market place and should be measured in a way that ‘tests’ whether a system has an effect on consumers’ choices and behaviours,

<sup>19</sup> For the purposes of this report *actual understanding* of a signposting scheme in market research should be measured in a way that simply ‘tests’ actual understanding of a system. By *understanding* we mean, for example, respondents being asked to judge the nutrient level of a product with signposting labelling on it, or asked to make a comparison over the nutrient level of two products rather than simply being asked how easy or difficult they would find a scheme to use which is more hypothetical and does not test how a scheme actually performs in terms of understanding

<sup>20</sup> By *perceived performance* we mean e.g. ‘how easy/difficult would you find this to use?’ ‘how useful would this be in helping you to make healthier choices?’, which does not address actual understanding of a system

<sup>21</sup> The first phase of this research was published in November 2004 ([www.food.gov.uk/foodlabelling/signposting/signpostingreport.pdf](http://www.food.gov.uk/foodlabelling/signposting/signpostingreport.pdf)) and the second phase in March 2005 ([www.food.gov.uk/multimedia/pdfs/signpostingnavigatorreport.pdf](http://www.food.gov.uk/multimedia/pdfs/signpostingnavigatorreport.pdf)).

against not having any front of pack signpost labelling, and find out if front of pack signpost labelling helped consumers to interpret nutritional information in a way which would enable them to make healthier choices and if so which formats worked best. Information on consumer preference for the four options tested was also captured in the study as well as information on what foods consumers would like to see signpost labelling applied to.<sup>22</sup>

The study found that all the signpost labelling options tested helped consumers to make quick and accurate assessments of the nutritional quality of foods and identify healthier products but that some performed better than others. Of the four options tested the “simple traffic light” scheme performed worst. The “non-coloured GDA” scheme also performed poorly. While the “multiple traffic lights” system and the “GDA coloured” scheme performed well and were liked by consumers, overall the multiple traffic light option was found to be most helpful to the majority of consumers. Although consumers found additional information on the nutrient levels to be helpful for making product comparisons, some consumers had difficulty in using GDA information correctly.

A further qualitative study was carried out to find out more about how consumers use the signposting information to assess the nutritional status of the food, and to understand what elements needed to be present for them to use the signpost in a real life supermarket situation. The study also provided an understanding of the rationale for why consumers wanted to signpost labelling on some foods and not on others.<sup>23</sup>

This study found that consumers were not familiar with the GDA concept and that they wanted the nutritional criteria which underpinned the interpretative element in a signposting scheme to be developed by a trusted and credible independent source. The research also found that consumers felt that the use of traffic light colour coding was more effective when it was supplemented with information on the levels of individual nutrients in the product.

The consumer research carried out by the Agency has found that consumers feel there is the strongest need for a signpost labelling scheme for: ready meals, breakfast cereals, pizzas, sandwiches and meal components such as burgers, sausages, pies, breaded, coated or formed meat, meat alternative, poultry and fish products. This is because consumers find it difficult to assess the nutritional quality of these types of products and they are generally consumed frequently or in large quantities.

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<sup>22</sup> The research findings were published in November 2005 ([www.food.gov.uk/foodlabelling/signposting/alt](http://www.food.gov.uk/foodlabelling/signposting/alt)).

<sup>23</sup> The research was published in November 2005 ([www.food.gov.uk/multimedia/pdfs/signpostqualresearch.pdf](http://www.food.gov.uk/multimedia/pdfs/signpostqualresearch.pdf))

There was strong interest in front of pack signposting on many other processed foods, including those which make nutrition or health claims, those which are promoted as part of a balanced diet but which should be eaten in moderation (e.g. some dairy products) as well as 'treat' foods (e.g. cakes, desserts, crisps, confectionery).

There was also a desire to see signposting on foods which are specifically aimed at children (i.e. packaged, advertised, marketed or promoted to appeal to children especially through the use of cartoon characters, on-pack promotions, collectibles, novelty or shaped foods and foods marketed as suitable for lunch boxes) as well as foods which form part of children's foods ranges.

There was less interest in signposting for foods purchased as ingredients for home cooking purposes (e.g. pasta, rice, oil, flour, fresh meat etc). Similarly most consumers felt there was less need for signpost labelling for products such as condiments and meal accompaniments (e.g. tomato ketchup, mayonnaise and salad dressings, pickles, sweet or savoury spreads), which while processed are generally consumed in small quantities.

#### In Summary

The FSA conducted two initial stages of qualitative research followed by a large piece of quantitative research and a final qualitative phase. The first two stages allowed for development and refinement of the four signposting concepts that were tested in the quantitative research.

The quantitative research had a large sample of 2676 interviews, conducted in hall test locations across the UK. The sample was designed to be representative of the UK population and large enough to allow for separate analysis of results by age, socio-economic group and location was possible. The four concepts were tested on actual size photos of real products. A 'no signposting' option was also tested which is extremely useful as it gives insight into how useful different signposting systems are compared to no additional signposting information.

As with some of the other research conducted, the FSA tested the signposting concepts on a range of products/product categories to evaluate how signposting worked across a wide range of products. This is clearly important as signposting needs to work on a wide range of products.

The FSA research tested 'actual understanding' which meant respondents were asked a series of questions designed to elicit how well the concepts worked in informing consumers about the nutrient level of four nutrients: salt, sugar, fat and saturated fat using the following wording:

*"Looking at the information on the pack, would you say this product is high, medium or low in [insert nutrient as appropriate]?"*

*"These packs also have information to help you decide whether to choose these products. Using this information, would you say one of these products has a higher [insert nutrient as appropriate] content, or would you say they say they are both the same?"*

The signposting concepts were rotated across five product/product categories and respondents were asked about the products' content for two of the four nutrients most relevant to that product type.

A rotation system was employed to ensure that an equal number of respondents looked at each signposting concept/product category. This also avoided any possible order effect.

The design of this quantitative research allowed for a balanced evaluation of actual understanding of four alternative signposts compared to no signposting and the sample size and design make for a robust piece of research.

### **CLCV - DGAL**

The CLCV-DGAL research tested two signposting systems, 'Nutrients' and 'Gerbaulet' and also the option of a supplementary indicator in addition to respondent's preferred system.

The research was quantitative with a fairly large sample of 1224. Unlike the FSA research, where comprehension of all the systems was tested with all respondents, the French sample was split so 50% (c.600) were asked questions about the Nutrients system and 50% the same questions but in reference to the Gerbaulet system. Whilst this reduced the sample size for each system, 600 is still a sufficiently large sample on which to conduct statistical analysis. A benefit of splitting the sample in this way is that it reduced interview length and thus respondent fatigue.

The sample was representative of those from a wide range of age groups, educational attainment level and attitude to nutrition and the sample allowed for analysis of any differences between these groups.

The French research tested *actual* understanding and also *perceived* usefulness and performance. Actual understanding was measured in a different way to the FSA research, with questions asked as follows:

*"On the left you will see a proposed label for a ready meal. Take a few moments to study it, and then I will ask you a question."*

*"The proposed label tells you that:*

- The ready meal contains one quarter fat*
- One portion of this ready meal contains more than one quarter of your daily requirement of fat*
- This ready meal contains some fat"*

One of the responses was incorrect and respondents could select as many answers as they thought applied. The three responses were prompted so if respondents had an alternative interpretation of the label this was not captured.

Both schemes were tested with and without explanation which generated some interesting results, with the Gerbaulet system performing better without the accompanying explanation. Performance testing without explanation is crucial as any signposting scheme should be simple enough to work for the majority of people without explanation (as even the best communications

campaign could never reach everyone). Testing with and without explanation however appears to have been a worthwhile exercise as it demonstrates how important it is to make any explanation of a system clear so as not to hinder comprehension.

Similar to the FSA research, a simple traffic light system - which gave an overall rating of healthiness/unhealthiness rather than individual nutrient levels - was not popular though interestingly respondents claimed they would prefer to see a green traffic light appearing on healthier foods than a red traffic light on unhealthy foods.

The symbols below (Fig. 7) were tested as an addition to the Nutrients or Gerbaulet system rather than as a stand alone system. Similar to colour-coding, they give direction as to the level of a particular nutrient. Around 60% wanted to see this particular system and only around 10% of respondents claimed not to want any directional/interpretative system to help them with their decision making in addition to either Nutrients or Gerbaulet.



Fig. 7 - Symbols tested in the CLCV-DGAL study

### Unilever

Unilever has conducted consumer studies, both qualitative and quantitative, in several countries, to assess whether front-of-pack labelling schemes can help consumers to make healthier choices and which systems are most effective.

The studies were all designed based on the following requirements:

1. The basic requirement is that a scheme is consumer friendly. Therefore liking, understanding, and credibility of schemes were assessed.
2. To make the difference, a scheme has to help consumers to identify healthier choices, and motivate consumers to make behavioural changes.

The slides presented to the group and available on BEUC's website present a summary of two of Unilever's front-of-pack labelling studies, two quantitative studies in which labels were shown to consumers on-pack, on a range of foods.

The first study was a European quantitative survey carried out in UK, Italy, Germany, and the Netherlands (March 2005). It tested six different indicators and showed no major differences between countries. The follow up in Italy and UK (June 2005) focussed on four systems (simple tick, multiple tick, five star system, and GDA) included baseline measures for health perception and usage – to better assess the effectiveness (Fig. 8).

Overall insights from these two European studies were:

- An indicator positively changes the healthiness perception of healthier products and that it positively affects usage intention in the desired direction for public health;

- Simpler systems are as effective as more difficult systems;
- Consumers expect the systems help them to make choices across all foods, not just within specific food categories.

Endorsement is absolutely key as systems without any reference to its origin were not seen as credible. International or national/nutrition health organisations were seen as most credible.

Fig. 8



### In Summary

Unilever employed a 2-stage quantitative approach to their research and tested 6 (4 in phase 2) different signposting concepts.

Both stages of research had fairly large sample sizes (1630 and 776) which are robust bases for statistical analysis and would allow for some degree of sub-group analysis. The methodology used was an online panel, the benefit of conducting research over the internet is to avoid any possible interview effect whereby respondents give answers deemed to be more socially acceptable.

Time taken to answer questions could be influenced by external factors (someone may leave their computer, or get distracted by something else which would increase time taken to answer a question). Online panel members are invited to take part in a number of research studies (though frequency of this does vary by panel) therefore it is sometimes argued that members of research panels are 'sensitised' to research and as such their attitudes may be slightly different. It is however unlikely that this would have an effect on responses about nutritional signposting. Whilst online panels are claiming to become more and more representative of those from lower socio-economic groups, they do tend to under-represent groups such as this who are less likely to have personal computers and as such, access to the internet.

### **ASDA Walmart**

Asda carried out both qualitative and quantitative research.

The qualitative research consisted of six one and a half hour interviews with groups of Asda shoppers selected as follows: demographics BC1 C2, female, in each group 2/3 primary Asda shoppers and 1/3 secondary shoppers. Shoppers were all selected on the basis that they see health for themselves and their families as important/very important and they read nutritional labelling on packs when making food and drink purchasing decisions.

The key conclusions were that:

- Consumers thought they would find front of pack colour signposting useful
- There was a clear preference for bold red, amber, green colours
- The consumers currently got nutrition information and guidance from a range of sources but their level of knowledge on probing could be low (only a minority could quote facts and figures, some were not familiar with grammes, many struggled with percentages and appeared sceptical of GDAs).

A clear preference for receiving information on a per portion basis was expressed and, whilst the groups thought that signposting should apply equally to value ranges, they appeared not to want to see front of pack colour coding on luxury or gift lines.

The quantitative research was carried out in May 2006 and involved two phases:

- 1000 in depth telephone calls with a representative sample of Asda shoppers; and
- 400 in depth store exit interviews with shoppers across four Asda stores.

When asked: 'If Asda provided nutrition information on the front of the package of food products (e.g. fat content, calories, salt, etc) would you prefer this information to be related to the portion size or by 100g?' the responses were: by portion size (60%), by 100g (22.9%), dependent on product (3.9%), and don't know/ don't mind (13.2%).

In particular female customers prefer nutrition information related to portion size and in particular also those with children in their household (64.4%); the youngest age group 18-24 and the oldest 65+ showed the highest percentages of those customers that did not have an opinion as to per 100g or per portion (30% and 27.5%) respectively.

Details of content of the research that is not considered as commercially sensitive or referring to competitors is included in the annex D3 to this report.

### In Summary

Asda conducted initial qualitative research (six focus groups) with Asda shoppers. The sample for these groups included a mix of life-stage and location and all saw health as 'very/quite important' and used nutritional labelling. Strong support for signposting was shown however those who are currently using nutritional labels are likely to have a higher level of understanding of nutritional information which may have made them 'warmer' to the idea of signposting. Other research studies that included those less interested in nutritional issues have however also revealed strong support for signposting.

The research highlighted some lack of understanding of GDAs, which given this focused on those who were already using nutritional labelling is notable. Similar to other studies, this research revealed some consumers struggled with percentages and also grammes.

## Tesco

### Information as provided by Tesco

In 1985 Tesco launched its Healthy Eating Initiative, offering customers healthy products as well as leaflets and nutrition information.

Tesco's long-term programme of research, which started in the 1980's, takes several forms:

- Monitoring Customer queries and complaints via stores and Customer Helpline.
- Customer Question Times (CQT) which help identify and respond to changing customer needs. These meetings enable staff and senior managers to hear customers' views on a wide range of issues and can involve up to 8,000 customers per year.
- Focus Groups based on loyal Tesco Customers to explore key issues raised during CQT.
- Yearly strategic pieces of research to help direct Customer and Community Plans for the future. This is achieved by the use of Triads (1 researcher to 3 customers) to help explore the issues in more depth whilst allowing discussion within the group on the decision making processes.
- Hall Tests to check a very simple specific issue and to get some quantitative data.

All of this research has contributed to the development of the current Tesco's front of pack labelling scheme and lead to a series of specific research projects to understand Customers response to developing issues such as fair-trade, allergies, provenance and health.

Tesco looked at various labelling options using focus groups. Proposals for a more graphical representation of nutrition information such as bar charts were rejected as being too scientific and confusing but when presented with a traffic light option the customer response was positive. Consumers wanted labelling to be "at a glance" and to answer the questions: "Is this good for me?" and "Is this safe?". Further exploration at some of the issues highlighted some anomalies in how products fitted into the bandings so it was decided to review the basis for the criteria i.e. moving from CPG energy based ones to "a lot" and "a little". The range of products, which fell into the red, amber and green bands, was unbalanced - very few green and early indications were that customers weren't using amber to help in decisions. The power of traffic lights was mainly directional and there seemed to be very little understanding of how they worked. Customers in the focus groups seemed to prefer straight facts about nutrition to colour coding and were worried about possible manipulation of a coded scheme.

Further focus groups on the current Tesco's scheme showed that customers find it clear and simple. The more numerate customers seem to cope with percentages and the less numerate appear to use percentages as a rule of thumb: customers said that a percentage GDA over 30% for snacks and 40% for main meals was seen as significant and a "stop and consider" level.

### In Summary

Tesco's development of a signposting scheme has been informed by a number of research studies using both qualitative and quantitative methodologies and existing customer insight.

Tesco's initial research into various signposting options was similar to that used by some of the other companies and countries in that it explored a range of options in focus groups. These focus groups led to the development of a traffic light signposting system. This traffic light system was piloted and subsequently withdrawn following further exploration which highlighted some confusion with their traffic light system and in particular over the use of amber and red. This confusion over amber does not appear to have been a finding of any of the other research made available that has explored a traffic light system therefore it would be useful to have further detail on these findings and on the methodology.

As qualitative research cannot be said to be representative of a population and the views of fewer are represented, there are likely to be large variations in what consumers see to be high or low in a particular nutrient. Therefore, for any non directional signposting scheme, it would be advisable to explore quantitatively opinions of what high, medium and low levels are for different nutrients and to look at any differences in this between demographic sub-groups (e.g. the lower socio-economic groups).

Tesco have conducted two pieces of quantitative research, one hall test (no information on methodology of the second). The first stage of quantitative research was with 308 Tesco customers and this focused on perceived usage of a traffic light system and of Tesco's current signposting system. Data are presented on a question where respondents were shown both schemes and asked 'which of these would make you think more about the products you buy?' 26% of respondents claimed the traffic light would cause them to switch products and 30% when using Tesco's current signposting scheme. On a base of 308, this result is however not statistically significant so neither scheme was rated more likely to cause consumers to switch when applying statistical significance tests (at a 95% level).

No *actual performance* nor *actual understanding* tests were performed in this research as far as can be seen from results available, however, similar to other research, respondents were asked about perceived usage and understanding. 75% claimed to understand Tesco's signposting scheme and whilst the majority (66%) correctly understood the colours on the signpost indicated the nutrient, and not the level of the nutrient, a third incorrectly assumed this indicated nutrient level.

A fifth of consumers correctly related GDA to amount in a serving and related it to daily intake.

A similar sized piece of quantitative research (306 interviews) was conducted with respondents aged 55+, from DE socio-economic groups and from ethnic minority groups. The research found that 94% of these respondents 'were

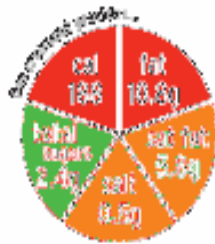
able to use the signposting system to make healthier choices' and that 6% felt they had a problem with understanding the system, with 12% stating they had problems understanding the percentages. Again this tested *perceived* understanding rather than *actual* understanding or performance which may have yielded different results.

## Sainsbury's

### Information as provided by Sainsbury's

The Wheel of Health (Fig 9) has been on Sainsbury's products since January 2005. It was developed by Sainsbury's to help customers see at a glance how much fat, saturated fat, total sugars and salt are in a serving of a food, plus how many calories. Each nutrient is colour-coded, green, amber or red, depending on how much they contribute towards the Guideline Daily Amount (GDA) based on the contribution a food makes to the diet as a whole (e.g. complete meal / meal component / snack), the size of the portion eaten and the latest dietary recommendations.

Fig. 9



In June 2005 research showed:

- 94% of our customers found the symbol easy to understand
- 77% say colour coding is useful
- 98% agree that it is important that supermarkets provide nutritional information
- 76% said the wheel would influence their purchase decisions

In May 2006 question specifically on the Wheel of Health were sent to 5000 customers/

- 80% of respondents felt Sainsbury's was good for people who wanted to lead a healthy lifestyle
- 84% of respondents had noticed the wheel of Health
- over 90% found it the Wheel very or quite useful in deciding what to buy
- 79% stated that it influenced what they bought

### In Summary

Sainsbury's have conducted two phases of quantitative research (phase 1 also included some qualitative interviews) exploring their 'wheel of health'. The second phase of quantitative research was based on a large sample of 3200 Sainsbury's customers (from a mailing of 5000 questionnaires). At this stage it is unclear what the demographic profile of these customers (by age, SEG etc) was so more detail would be required on this in order to comment on how representative the research was of different groups.

Sainsbury's quantitative research appears to have focused on perceived performance and understanding rather than actual understanding of the Wheel of Health and no testing of alternative concepts was conducted.

### **Conclusions - Preliminary evaluation of available research results**

*How are the schemes currently under scrutiny performing with consumers?*

(Contribution by Mairi Hetherington, COI)

1. Encouragingly, all research conducted shows support among consumers for a front of pack simplified labelling system (where explored in the research).
2. No 'real life' performance testing has been carried out therefore it remains to be seen how the various schemes are now working in practice. Where quantitative research has been carried out, in the majority of cases, *actual performance* of signposting schemes has not been tested, but rather actual understanding and *perceived performance* e.g. 'would labels be useful when you're deciding what to buy' and 'x% said the figures were clear and understandable'. Data such as this, when used in isolation should be treated with caution for a number of reasons:
  - a) Where questionnaires are interviewer administered, responses can be influenced by an 'interviewer effect'. By this it is meant that respondents may give responses seen as being more 'socially acceptable' than they actually believe. When asking questions around understanding of a signposting scheme, which may be seen as a reflection of intelligence, respondents may feel uncomfortable, or embarrassed saying they would not understand it, or find it difficult to use.
  - b) Respondents may well claim to find a scheme easy to understand and use, however we have no actual data on whether they are using the schemes correctly and taking out the correct information. For example in the Tesco's research, a third of respondents thought the colours signified nutrient level which is not the case. It is however likely that many of these respondents would also have said they found the schemes 'clear and understandable' as they were not aware of their misinterpretation of the scheme.

*Actual understanding* measurements are therefore crucial in order to gain an understanding of how the various schemes work. The FSA quantitative research set up a number of performance evaluations (explained earlier) which went beyond *perceived performance* or understanding and aimed to get as accurate a picture as possible on actual performance of different signposting schemes. Further actual performance testing would therefore be advisable on schemes where this has not yet been tested.
3. Endorsement is seen as key – Unilever, FSA and Sainsbury's research have all highlighted the need for any scheme to be endorsed by a credible body e.g. government or a national or nutrition health organisation. Tesco's research highlighted concern amongst consumers over the organisation behind a signposting scheme, and specifically a traffic light

scheme. Their research stated that consumers were concerned that colour coding of nutrient level could be open to manipulation by other companies or government. Whilst the other research highlighted that credible provenance of any scheme was vital, as far as can be seen, it is only the Tesco's research that flagged up any concern over a government-led scheme.

4. Where tested, colour-coding of nutrient level has generally been seen as positive across most of the research studies (Asda, Sainsbury's, FSA). The exception to this is the Tesco's research that concluded a traffic light system was confusing for some consumers, particularly around the meaning of amber and red.

The FSA performance testing appears to have measured the effect of colour-coding in the most robust manner in that it was measured quantitatively, with a large sample size. This research demonstrated the positive effect colour coding has on comprehension by the fact that the two strongest performing concepts across the performance evaluations were colour coded according to nutrient level (one with GDA information, the other without). Further evidence of the positive effect of colour coding is demonstrated by the fact that a mono-chrome GDA system (i.e. not colour-coded according to nutrient level) performed significantly worse than an identical version that was colour-coded. In addition, the two most favoured concepts by consumers were colour-coded according to nutrient level.

The evidence from the FSA research and other studies conducted indicates that colour-coding of nutrient level is helpful to and popular with consumers. Further research into the confusion over amber and red highlighted in the Tesco's research would therefore be advisable in order to further explore this apparent discrepancy between results.

Interestingly, whilst the French research did not test a system that colour-coded nutrients according to level, it did test a system which gave direction as to whether individual nutrients were at 'ok' or high levels which the majority of respondents were in favour of. Only 10% of respondents claimed not to want any kind of direction from a signposting scheme in addition to the nutritional facts alone. Evidence such as this highlights that there is demand for direction/interpretation (be that in the form of colour coding in FSA, Asda and other research or in an 'ok' in the French research) on the nutrient level of products in a signposting scheme.

5. A 'simple traffic light' scheme or equivalent health mark which gives an overall rating of the nutritional value of a food product was not popular amongst consumers in the French and FSA research. In addition, when actual performance tests were conducted in the FSA research, this scheme did not perform well.
6. A number of the research studies have highlighted some confusion over GDAs, percentages and grams therefore further investigation into this issue would be advisable.

### Sales data on different simplified schemes

Less healthy option	Sales performance	Healthier option	Sales performance
Standard Salmon & Cucumber sandwich  22% saturated fat GDA 29% salt GDA	- 30%	Healthy Living Salmon & Cucumber sandwich  8% saturated fat GDA 18% salt GDA	+46%
Standard prawn mayonnaise sandwich  28% saturated fat GDA 58% salt GDA	- 37%	Healthy Living prawn mayonnaise sandwich  2% saturated fat GDA 34% salt GDA	+46%
Standard Egg and Cress sandwich  25% saturated fat GDA 31% salt GDA	+ 37%	Healthy Living Standard Egg and Cress sandwich  8% saturated fat GDA 15% salt GDA	+97%

Simplified labelling schemes have already been implemented by a number of manufacturers and retailers across Europe, including Tesco and Sainsbury's in the UK and ICA in Sweden. The introduction of simplified front-of-pack nutrition information is part of a wider approach to better nutrition and tends to happen in parallel with a number of other in-store initiatives (leaflets, promotions, etc) and healthy lifestyle campaigns and activities, including programmes to encourage consumers and children to be more active.

Below is a summary of the sales data made available by Tesco and Sainsbury's. These data illustrate the performance, over a few weeks, of the simplified labelling schemes currently available on the market and their contribution to influencing consumers' choices towards healthier products. More information is available on the BEUC website.

#### **Tesco**

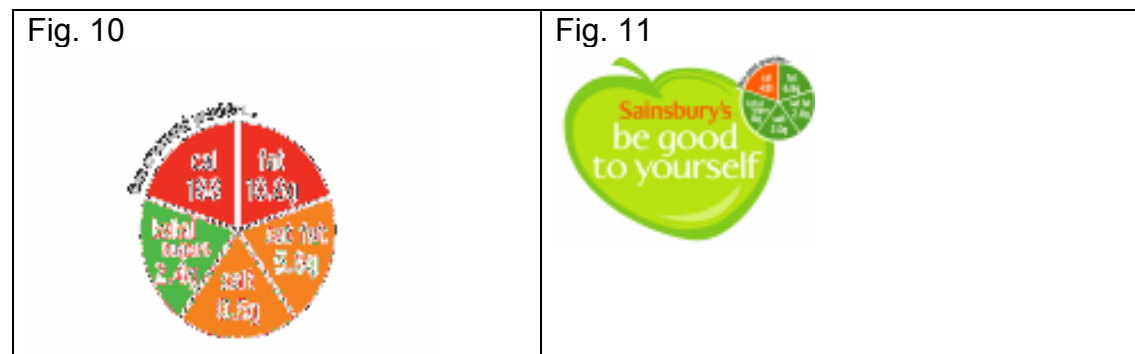
##### Information as provided by Tesco

Sales of lower-fat ready meals increased when GDA signposts were added, outselling higher fat alternatives by more than 7% and the products with the highest fat levels show strong sales declines as customers switch to healthier options. Lower-salt ready meals are outselling higher salt products by 10% when GDA Signposts were added and the products with the highest salt levels show strong sales declines as customers switch to healthier options. It is relevant to note that well over 400,000 sandwiches and 5 million ready meals are sold in Tesco's stores each week.

The table below summarises some examples:

### Sainsbury's

Information as provided by Sainsbury's



Healthy products carrying the Wheel of Health (Fig. 10) are seeing increased sales as customers make more healthy choices. 200 Sainsbury's own brand products carry the apple stamp logo (Fig. 11) and all of these products also carry the Wheel of Health. To qualify for an apple stamp products must be green and amber on the Wheel of Health (except good fats and natural sugars).

Sainsbury's registered an overall 10% increase in the sales of apple stamped products. Some specific category performances are: pre-packed fish (+27%), fresh soup (+12%), bakery and plant bread (+8%), skinless chicken (+14%).

There is directional evidence that the Wheel of Health is impacting customer behaviour at product level. Here are some examples:

#### All butter croissant

The wheel was implemented Sept 05 (2 red, 2 amber, 1 green). Sales declined -8% 12 weeks after putting the Wheel of Health on the product.

#### Sliced white loaf

Lower salt (15% less salt) and higher fibre, all green on wheel. Six weeks post launch sales increased +6% compared to the total bread category which decreased by -1.5% over same period.

#### Be Good To Yourself tinned soups

There are five in this range and all carry at least 4 'greens' on wheel, which was implemented in Dec 05. Sales have more than doubled with average growth +126%

#### Just Cook range

This range is growing at 13%. All 41 products carry wheel of health, which was implemented in Oct 05. A mixed performances was shown at line level with the biggest decline on lamb & mint, potentially driven by consumer 'surprise' at a primary meat & herb being high in fat and saturated fat and amber on calories.

### Cereals

35 cereals carry the apple stamp & wheel of health since July 05. Sales increased by +14% over the 12 weeks post launch, compared to an increase in sales of +7% over same period.

### Frozen ready meals

The Wheel of Health was implemented on 15 Sainsbury's ready meals since Oct/ Nov 05. The average growth on lines with no "reds", 12 weeks post implementation vs. pre implementation was + 7%. The decline in lines with one or more "reds" over same period was -35%.

## **Conclusions - Preliminary evaluation of available sales data**

*What are the limitations of using sales data to evaluate different simplified labelling schemes? Can any conclusions be derived from the available sales data?*

(Contribution by Mike Rayner, University of Oxford)

One of the most interesting developments in recent months has been for some of the UK retailers who have introduced simplified nutrient labelling schemes to claim that their schemes have had significant effects on sales.

Studies of the effects of schemes in operation are much needed. Most of the research to date has involved consumers choosing between schemes that might be used on packets, or being asked to carry out tasks using potential schemes. To date we have had only a few studies that have evaluated the effects of schemes on products in real supermarkets. Examples of such studies include a study of the Swedish keyhole scheme<sup>24</sup> and of the Australian Tick program.<sup>25</sup>

Moreover, of the research on schemes in operation, much of that has merely involved asking people what they thought of the schemes or how they said they reacted to the schemes rather than measuring their effects on actual behaviour. The reports of schemes having an effect on sales are therefore very interesting.

However the problem with existing reports is firstly the lack of detail about methods that they provide (these are largely in the form of power-point presentations at the current time) and secondly the comparability of methods. Sales of products fluctuate for a variety of reasons (e.g. changes in price, consumer taste, time of year) so we need to be clearer that the reported changes in sales are actually the result of the introduction of the new simplified labelling schemes and not due to some other change to the labelling, price or other characteristics of the products. Furthermore since different retailers collect and present the data in different ways it is difficult to compare the results from the different reports.

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<sup>24</sup> Larsson I, Lissner L. (1996) The Greek Keyhole nutritional campaign in Sweden – do women with more knowledge have better dietary practice? *European Journal of Clinical Nutrition*. 50: 323-28

<sup>25</sup> Rayner M, Boaz A, Higginson C (2001) Consumer use of health-related food endorsements in the UK and Australia. *Journal of Nutrition Education*. 33; 24-30.

The table below summarises some of sales data provided by Tesco and Sainsbury to illustrate this.

	Nutritional characteristics	Increase (↑) or decrease (↓) in sales after introduction of the label on the packet
Salmon en croute (Tesco)	Fat: 53% GDA Sats: 91% GDA	↓ 29% (8 weeks)
Peppered steak rosti bake (Tesco)	Fat 51% GDA Sats 88% GDA	↓ 26% (8 weeks)
Vegetable curry (Tesco)	Fat 25% GDA Sats 20% GDA	↑ 33% (8 weeks)
Ready meals (Sainsbury's)	One red or more*	↓ 35% (12 weeks)
15 ready meals (Sainsbury's)	No reds**	↑ 7% (12 weeks)

\* I.e. high in either one or more of calories, fat, saturated fat, sugars or sodium,

\*\* I.e. medium or low in calories, fat, saturated fat, sugars and sodium,

The results suggest that both schemes are having significant and comparable effects on sales of ready meals carrying the new labelling schemes – at least in the short term. However because we do not have enough detail on the methods by which the figures in this table have been arrived at, and because the figures have been obtained in different ways, we cannot be sure of that conclusion.

Firstly we cannot be certain that the data are representative of all ready-meals that have carried the new labelling scheme – particularly in the case of the Tesco ready meals. Secondly we do not know whether the declines and increases in sales are merely the result of the introduction of the labelling scheme. Thirdly because the sales changes have probably been obtained in different ways (for a start the period of time over which change has been assessed is different) then we cannot be certain that the data is comparable.

It is encouraging that sales data show an effect of the introduction of the new simplified labelling schemes but they need to be published in reports which clearly outline the methods for collecting and analysing the data before any clear conclusions can be drawn. Some schemes are likely to have greater effects than others on sales, but to compare schemes the sales data needs to be collected and analysed in the same way.

## Questions considered by the group

### 1. Is there a need for an EU-wide system?

It was agreed that there is a need for an EU-wide simplified labelling scheme. The main aim of such a scheme should be to help consumers from all backgrounds to choose a healthy diet by providing them with at a glance information on the nutritional content of a food.

Such a scheme should be in addition to nutrition information provided on the back of pack and would constitute an incentive not only for consumers to choose healthy food but also for producers to reformulate the products on the market in favour of healthier options.

### 2. Would a simplified labelling system pose artificial barriers to trade?

It was the general opinion that a simplified labelling system would not pose a barrier to trade if it had a common format and common criteria, as labelling rules at an EU level remove barriers to trade rather than creating them and this can be achieved depending on the design of the format (i.e. minimal use of language in the design). Considerations would also be needed regarding imports from outside the EU.

### 3. If an EU system were proposed, would it need to take into account the differences between national diets?

Although it was acknowledged that an EU-wide system would consider the differences between national diets, it was agreed that, because the broad nutritional priorities are the same across Europe a system should not depend on different dietary habits.

The group also considered whether differences in age, sex, geographical location, exercise and seasonal factors should be taken into account but it was agreed that the system decided upon must be as easy as possible for consumers to understand, taking into account different socio-economic groups.

### 4. Would it be possible to summarize all relevant information with a simple indicator or would a different indicator be needed for each nutrient?

The group was asked to consider whether a single, simple indicator would be sufficient or an approach based on providing information on the individual nutrients with an interpretative element to help contextualise the information would be more appropriate.

There are different types of simple indicators: single traffic lights, 'tick' schemes, health marks and healthy eating logos. There is very clear evidence from the UK and now from France that consumers don't like over-simplified systems such as the single traffic light. Research on the Swedish Keyhole scheme and the many 'tick' schemes run by heart foundations round the world, in particular the Australian Heart Foundation's tick scheme suggests

that consumers do like them, and there is some evidence that they use them. A simple indicator would provide some information of the overall nutritional characteristics of a product and not at a glance information on the levels of specific important nutrients.

The use of a different indicator for each nutrient seems to be the preferred option in most studies analysed by the group.

Questions as to whether people like percentage GDA, colour coding or negative messages depend on people's socio-economic group and levels of education. It was agreed that schemes that involve displaying percentage GDAs as numbers are only useful to people with the skills to interpret the numbers, whereas schemes that involve using words or colour coding to indicate the levels of nutrients in foods require less familiarity and confidence with numbers.

Participants debated whether a simplified system should provide simplified factual (numerical) information, an interpretation of the factual information or both. It was noted that factual numerical information without interpretation was not well received by consumers. The CLCV-DGAL study seems to indicate that a combination of factual numerical information and some interpretation were liked by more than 90% of the 1200 people interviewed.

The FSA in the UK and others, carried out research on what consumers want and prefer regarding a labelling system. On the basis of their research, the FSA Board arrived at its decision to use the 'multiple traffic light' system for the four nutrients that consumers highlighted as important to them. The coloured traffic light system allows consumers to make their own judgements as to the overall place of a particular food in their diet.

The level of a nutrient in a food can be given in more than one way so, for example it is possible to give % GDA and overlay it with colour coding. Some members of the group agreed that this would be a considerable step forward as it would work on two levels: an easily recognisable system once consumers get used to using the traffic lights together with a more complex system for those consumers who are able to understand and use a GDA system.

##### 5. Which are the nutrients to be considered?

It was agreed that consumers would not benefit from having a large number of nutrients on the front of the pack.

The table below shows the nutrients used in different systems.

Simplified Scheme	Calories	Fat	Sat Fat	Trans Fats	Sugar	Salt	Fibre
FSA-based		X	X		X	X	
Tesco <sup>26</sup>	X	X	X		X	X	
Sainsbury's	X	X	X		X	X	
ASDA	X	X	X		X	X	
Keyhole		X	(X)		X	X	X
My Choice			X	X	X	X	

The following nutrients, selected based on public health priorities and consumer research, should be shown on the front of the pack: total fat, saturated fat, sugars and salt.

**6. Could two different simplified labelling schemes (e.g. healthy eating logo and multiple traffic light) co-exist on the same pack?**

Some participants felt that different systems such as a 'healthy eating logo' and a 'multiple traffic light' could be used to complement each other.

This approach is common in the UK where 'traffic lights' and 'healthy eating logos' or '% GDAs' and 'healthy eating logos' already co-exist (e.g. in Sainsbury's and Tesco's healthy eating ranges).

It was agreed by the group that the co-existence of a healthy eating logo with a different simplified labelling system could be considered but since the aim of simplified labelling is that it should be simple, having more than one system for consumers to work out could get confusing.

**7. Should simplified labelling allow comparisons between food categories as well as within food categories?**

It was agreed that an ideal system would allow comparisons both within and across food categories.

All agreed that no product groups should be excluded from the scheme although the consumer is likely to find it more beneficial for certain product categories than others. If there were to be different criteria for different categories of food then category definitions should be broad. Unilever research in UK, Italy, the Netherlands and Germany clearly showed that consumers expected a system to work across the board, not just within food groups.

<sup>26</sup> Also adopted by some manufacturers in the UK : Danone, Kellogs, Kraft, Nestle, Pepsico

An additional consideration was that if there are to be different criteria for different food categories then they will need to be defined and all members agreed that the process of defining product categories would be extremely difficult.

8. Should simplified labelling be expressed on a portion serving basis? If so, what constitutes a representative portion serving ?

Some participants felt that portion sizes should be used. However, some issues were raised which complicate matters:

1. Portion sizes for each food type vary and are not commonly agreed;
2. The contributions of foods to the diet is affected by frequency of consumption as well as by portion size; and
3. There is a need to distinguish between serving size and portion size (e.g. one serving of chocolate could be about four squares and a portion only one square).

A number of solutions to these problems were suggested:

- Keeping the information on front of pack consistent across all foods
- Dietary surveys could be used to determine average portion sizes. However, as it is impossible enough at a national level, creating a definitive list of portion sizes would be unrealistic.

The group agreed that although there is some evidence (ASDA, EUFIC) that consumers prefer nutrition information to be expressed per serving or per portion rather than per 100 g there is no performance testing to show which is more helpful to consumers. The use of nutrition information per portion would only be relevant if portions are clearly defined and realistic and concerns were expressed with regard to the possibility of comparing products based on information provided on a manufacturer specified portion size basis.

In conclusion it was agreed that a combination of both forms of information per 100 g and per serving would allow the consumer to make a quick assessment of the nutrition content of the food and compare different products.

9. What type of endorsement would make a system credible for consumers?

There was very clear consensus that only a system developed or endorsed by an independent authority would be credible for consumers. For example, research by Unilever in four European countries showed that WHO and National Nutrition Organisations (e.g. Voedingscentrum in NL; British Dietetic Association in UK; Deutsche Gesellschaft für Ernährungsforschung; Istituto Nazionale di Ricerca per gli Alimenti e la Nutrizione in Italy) were rated as the most credible organisations by the interviewees. It was noted that a trusted source of information underpinning a front of pack scheme may be different in different countries, in the UK and Sweden the national food authorities (FSA and Swedish national Food Administration) were considered a credible and independent source by consumers. All participants recognised the important role that EFSA would play in the endorsement of an EU-wide scheme.

10. Which would be the most effective system for consumers with low numeracy skills? (evidence)

It was agreed that a simplified labelling scheme should not just reach those consumers who are already health conscious and likely to be looking at labels, it should also try and encourage those who are not currently motivated to think about their diet and to switch to healthier options.

There is some indirect evidence that consumers from lower socio-economic backgrounds and lower levels of education would have more difficulty with the systems that use numbers or percentages and that they may favour simpler systems:

- Especially vulnerable groups (lower educated, lower income) are least likely to read food labels<sup>27</sup>
- When ability (e.g. cognitive ability) and motivation are low, people are less likely to spend time and effort to process information<sup>28</sup>
- Visual information is processed peripherally while more complex information such as nutrition fact boxes and GDA systems need to be processed via the central cognitive route. Information processing via the central cognitive route will take more time and effort and is therefore less effective when the consumer has to make a decision in a shop: identifying a healthier product is easier by screening for simple ticks than by reading and interpreting GDA's.
- The Elaboration Likelihood model by Petty & Cacioppo states that the two routes to persuasion are central and peripheral. The central route refers to the importance of argument-based thinking while the peripheral route emphasises the psychological processing of messages without argument evaluation (i.e. attention to the message is drawn by surface characteristics, like for example bright colours, emotion, endorsement). When the motivation and the ability for argument evaluation are high, people follow the central route to attitude change. When the motivation and the ability are low people are more likely to follow the peripheral route to attitude change. People are thus more likely to follow the central route (to evaluate the arguments in the message) when they possess a higher level of message (or product) involvement<sup>29</sup>.

In June 2005 the FSA tested the performance of four signposting formats (Single Traffic Light (STL), Multiple Traffic Light (MTL), Colour-Coded GDA (CGDA) and monochrome GDA (MGDA)) with 2,676 consumers<sup>30</sup>. The sample was chosen to be representative of the UK population of 16-70 year olds, with quotas set on gender, age, working status and socio-economic groupings (Appendix C). An ethnic minority boost sample was included. A "no signposting" option was also tested.

<sup>27</sup> Cowburn & Stockley, 2005

<sup>28</sup> Eagly & Chaiken, 1993; Fiske & Neuberg, 1990; Petty, Cacioppo & Schumann, 1983

<sup>29</sup> Petty, Richard E., Cacioppo John T. & Schumann, David (1983). Central and Peripheral Routes to Advertising Effectiveness: The Moderating Role of Involvement. *Journal of Consumer Research*, 10 (2), pp. 135-146

<sup>30</sup> [www.food.gov.uk/foodlabelling/signposting/alt](http://www.food.gov.uk/foodlabelling/signposting/alt)

In individual product assessments, MTL performed best across all socio-economic groups including C2 (89% correct responses compared with 67% with CGDA) and DE subgroups (89% compared with 65% with CGDA). When comparing two products the level of correct responses was higher for CGDA relative to MTL for the whole sample, however there was no significant difference among C2 respondents (89% and 87% correct responses respectively).

With the main ethnic minority groups, MTL performed best in the individual product evaluation (93% correct responses against 66% for CGDA). When comparing two products, among main ethnic groups CGDA performed better than MTL (92% and 83% correct responses respectively). As for the whole population, MTL outperformed CGDA by a greater margin (27 percentage points) in Task 1 than that observed for CGDA in Task 2 (9 percentage points).

The preference data show that consumers liked both formats which included colour coded information to help categorise the level of individual nutrients in a food as high, medium or low (CGDA and MTL) much better than those which did not (STL and MGDA). Overall, CGDA was the preferred format (65% preferred this format) since it was considered to contain the most information.

Based on the evidence the MTL format was considered most likely to help most consumers to make healthier choices. Performance amongst C2DE and ethnic minority groups is particularly important; the poor performance of CGDA in these groups (a third of respondents gave inaccurate responses) for the core task of categorising products on their nutritional characteristics has been central to this decision.

### **Additional considerations**

#### **Simplified labelling as part of a wider strategy**

The importance of developing consumer education to support simplified labelling and increase consumer ability to use it wisely was underlined throughout the group discussions. However, it was agreed that this should not involve intensive education but provision of simple information by national authorities, manufacturers, retailers, consumer organisations and the media. The need for consistent information was also strongly highlighted as the promotion of different schemes and different messages does not help consumers' motivation and understanding.

*Is there a need for the use of simplified labelling in catering?*

As many people now eat out on a regular basis, it is important to consider this once a scheme for pre-packed foods has been agreed. A report published in April 2005 by Which?<sup>31</sup> shows that UK consumers do want more information about the nutritional quality of food when eating out.

It is likely that a scheme for catering outlets will need to be very simple if it is to be practically used. It was noted that using the same scheme consistently on pre-packed foods, foods sold loose and in restaurants would strongly contribute to the awareness of the scheme and strengthen its impact in the long term.

*Evaluation*

The discussion group agreed on the need to develop and put in place adequate and robust monitoring plans to evaluate the performance of simplified labelling in real situations. The results of such evaluations would allow for a better understanding of consumer behaviour in relation to the use and understanding of front-of-pack nutrition information.

**Conclusions**

The group<sup>32</sup> agreed that:

- an EU-wide simplified labelling scheme will help consumers from all backgrounds choose a healthy diet by providing them with at-a-glance information on the nutritional content of foods;
- an EU-wide simplified labelling scheme should constitute an incentive not only for consumers to choose healthy food but also for producers to reformulate the products on the market in favour of healthier options;
- such a scheme should be on the front of the pack and in addition to nutrition information provided on the back of pack;
- there is a clear need for such a scheme to be endorsed by a credible independent body;
- the development of such a scheme requires agreement on both a clear format and a set of underpinning nutritional criteria;
- the EFSA might have an important role in the development of the criteria in consultation with stakeholders;

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<sup>31</sup> Which? Report: What's really on the menu, April 2005  
[http://www.which.co.uk/files/application/pdf/0504menus\\_rep-445-55386.pdf](http://www.which.co.uk/files/application/pdf/0504menus_rep-445-55386.pdf)

<sup>32</sup> Except Unilever, see disclaimer on Page 8

- the format of such a scheme should be based on robust consumer research as to what is most effective and easy to understand for consumers. DG SANCO should take this forward in conjunction with stakeholders;
- an EU-wide simplified labelling scheme should not require intensive education but should be supported by simple and consistent information from national authorities, manufacturers, retailers, consumer organisations and the media;
- an EU-wide simplified labelling scheme should be introduced as part of a broader EU strategy to tackle obesity and diet-related disease;
- there is a need for well-planned and consistent evaluation of the performance of simplified labelling to better understand how it is used by consumers.

The development of a front of pack simplified labelling scheme should take the following considerations into account:

- the use of colour coding of levels of nutrients as an interpretative element to make sense of numerical information appears to be a promising way forward, based on the research considered by the group;
- consumers would not benefit from having a large number of nutrients on the front of the pack. The nutrients to be taken into account should be based on public health priorities and consumer research and include total fat, saturated fat, sugars and salt;
- in the context of providing overall nutrition information, the suggestion of a simple system merely providing information about the energy content of the food was considered too limited;
- although no consensus was reached on whether a front of pack simplified labelling scheme should be based on information per 100 g or per serving, there was general agreement that a combination of the information per 100g and per serving would allow the consumer to make a quick assessment of the nutrition content of the food and compare different products.

## ANNEX A

### DISCUSSION GROUP ON A SIMPLIFIED LABELLING SCHEME (TERMS OF REFERENCE)

In the ongoing public policy discussions on the subject of diet and diet related diseases it is widely accepted that there is the need to find good ways to give consumers understandable and useful information on the nutritional quality of foods, including information regarding certain key nutrients, in other words “simplified nutritional labelling”.

Many food companies have taken the initiative to develop better and more simplified ways of communicating nutritional information to consumers. Unfortunately, different companies have developed different methods of doing this; consumers therefore cannot easily compare the nutritional qualities of competing foods from different manufacturers.

A great deal of research is being carried out at national level to assess different ways of providing simplified nutritional labelling. This work is immensely valuable but could result in differing national approaches to nutritional labelling, to the detriment of the free movement of goods.

The issue of simplified nutritional labelling has also arisen of course within the EU Platform for action on Diet, Physical Activity and Health. For example, here are some of the conclusions reached at a Workshop on consumer understanding and attitudes to nutrition information, organised on 14 Nov 2005 by McDonald’s Europe, under the auspices of the Platform:

- There was general agreement that the current legislation needs updating, the 'traditional' nutrition label is still needed, but needs to be accompanied by some simplified way of passing on nutrition information;
- All agreed that the way forward must be based on good consumer research. It was suggested that a group be set up to pool knowledge on research on nutrition labelling/signposting and to help when designing future research in the area;
- Most participants agreed that the signposting should be on the front of the pack to make it more visible and usable for the consumer;
- All agreed that it is important for the consumer that there is a consistent approach to front of pack information;
- Commonality and move away from open competition is needed.

There is therefore a very broad support for the principle of simplified nutritional labelling, but there is no agreement yet on a single scheme or model for such labelling. Against this background, following a suggestion from Dorette Corbey MEP, and as part of our commitment to the Platform, BEUC is initiating a project to try to develop, with a range of different stakeholders, a consensus on a model or scheme for providing front of pack nutritional information in a simplified form that consumers can use to compare the nutritional qualities of different food choices at point of sale, and later.

The model to be developed should meet the following criteria:

- It should be based on available consumer research and agreed scientific criteria as to what is the most useful and easy to understand for consumers;
- The relevant simplified information should be on the front of pack or label, in addition to a nutrition information panel elsewhere on the pack;
- It should enable consumers easily to make comparisons between different products within a food category, as well as across food categories;
- It should be used consistently across all products in order to avoid confusion;
- It should be applicable EU-wide;
- It should provide a basis for developing consumer education, and improving nutritional choices as part of the wider series of actions to promote better health choices and to combat diet related diseases;
- While intended in the first place for pre-packaged foods, it should ideally be adaptable for use in catering.

To begin the process, BEUC will seek a range of specific stakeholders (food industry, retail etc) who are willing to accept the above criteria and to participate in a discussion group with BEUC in accordance with these criteria and the further principles set out below. (It is not intended to establish a group that could be said to be representative of all potential stakeholders – this would hardly be possible and would in any case be very time-consuming.)

The Discussion Group would work according to the following principles:

It would be **time-limited** – with a deadline of six months.

It would be **intensive** – with meetings planned for approximately once a month. (In appropriate cases tasks could be allocated to sub-groups or (small) groups of experts.)

It should be **open** in that the discussions would not be confidential, and all relevant documents would be posted on a website to which third parties could submit comments.

The final outcome of the group's work should be a model representing a wide (but not necessarily unanimous) consensus of members of the group. (Obviously, members who do not support the final consensus will not be described as doing so.)

**ANNEX B****REFERENCES AND LIST OF SOURCES USED BY THE DISCUSSION GROUP ON SIMPLIFIED LABELLING**

2. International Obesity Task Force for the EU Platform briefing paper  
[http://ec.europa.eu/health/ph\\_determinants/life\\_style/nutrition/documents/otf\\_en.pdf](http://ec.europa.eu/health/ph_determinants/life_style/nutrition/documents/otf_en.pdf)
4. McDonald's Nutrition Information Initiative, Research report prepared for McDonald's Europe by 2CV: Research, Nov 2005; and Development of European Guideline Daily Amounts (GDAs) for use in consumer nutrition information systems and food profiling, Nov 05
5. EUFIC research on labelling
  - Phase 1: Getting insights on consumer understanding of nutrition information on food labels motivational aspects. EUFIC Forum 2: <http://www.eufic.org/qb/heal/heal12.htm>
  - Phase 2: Identifying the potential of a number of on-pack nutrition communication concepts to engage consumers and help them understand nutrition information on food labels. EUFIC Forum 3 (which will be published on the website before the end of June, so till then it is confidential), attached document  
Peer review article (submitted to the scientific journal Appetite early in July 06)
  - Phase 3: Systematic review of consumer understanding of nutrition information on food labels in Europe since 2003. Ongoing work with Prof. Klaus Grunert from Aarhus School of Business. Key line findings to be presented in the 1st Public Health Nutrition congress, Barcelona, Sept 06.
6. Cowburn G, Stockley L (2003) A systematic review of the research on consumer understanding of nutrition labelling. European Heart Network: Brussels
7. Cowburn G, Stockley L (2004) Consumer understanding and use of nutrition labelling: a systematic review. Public Health Nutrition 8 (1): 21-28.
8. European consumer organisations invite you to choose our menu, BEUC Nutrition Campaign – Brochure X/010/2005
9. BEUC Position Paper on Simplified Labelling – BEUC/X/010/2006
10. BEUC Study on Consumers' perceptions of labelling of foodstuffs – BEUC/X/032/2005
11. Joint WHO/FAO Expert Consultation on Diet, Nutrition and the Prevention of Chronic Diseases (2003): Diet, Nutrition and the Prevention of Chronic Diseases. WHO technical report series 916. Geneva, Switzerland.  
[http://www.who.int/hpr/NPH/docs/who\\_fao\\_expert\\_report.pdf](http://www.who.int/hpr/NPH/docs/who_fao_expert_report.pdf)

12. The Netherlands tripartite classification model for foods by the Netherlands Nutrition Centre.  
<http://www.voedingscentrum.nl/NR/ronlyres/0AF85A19-79B1-4DB5-A0E8-C8BFFD44B089/0/Criteriaengelssite.pdf>
13. References to consumer studies in Sweden and the importance of the keyhole label:
  - Becker W, Enghardt H. Matvanor och inställning till mat och hälsa. Vår Föda 1994;46:154-66
  - Becker W, Pearson M. Riksmaten 1997-98. Befolkningens kostvanor och näringsintag. Metod- och resultatanalys. Livsmedelsverket, Uppsala 2002
  - Institute of European Food Studies. Pan-EU survey of consumer attitudes to food, nutrition and health. Strain JJ (ed.) Eur J Clin Nutr 1997; 51(Suppl 2): S1-49
  - Mæland JG, Aarø LE. Atferdsteori og forebyggende helsearbeid i praksis. Tidsskr Nor Lægeforen 1993; 113: 51-5
14. Norsjöprojektet – en svensk modell för lokalt folkhälsoarbete, 1999  
<http://bmj.bmjournals.com/cgi/content/full/315/7108/582>
15. Quantitative Evaluation of Alternative Food Signposting Concepts – Results of Consumer Research conducted on behalf of FSA - Nov 2005  
<http://www.food.gov.uk/multimedia/pdfs/signpostquanresearch.pdf>  
FSA information aimed at helping consumers using signposting wisely:  
<http://www.eatwell.gov.uk/foodlabels/trafficlights/>  
Additional information on signpost labelling can be found at:  
<http://www.food.gov.uk/foodlabelling/signposting/>
16. The first phase of information aimed at the consumer can be viewed at:  
<http://www.eatwell.gov.uk/foodlabels/trafficlights/>
17. The first phase of information aimed at the consumer can be viewed at:  
<http://www.eatwell.gov.uk/foodlabels/trafficlights/>
21. The first phase of this research was published in November 2004 ([www.food.gov.uk/foodlabelling/signposting/signpostingreport.pdf](http://www.food.gov.uk/foodlabelling/signposting/signpostingreport.pdf)) and the second phase in March 2005 ([www.food.gov.uk/multimedia/pdfs/signpostingnavigatorreport.pdf](http://www.food.gov.uk/multimedia/pdfs/signpostingnavigatorreport.pdf)).
22. The research findings were published in November 2005 ([www.food.gov.uk/foodlabelling/signposting/alt](http://www.food.gov.uk/foodlabelling/signposting/alt)).
23. The research was published in November 2005 ([www food.gov.uk/multimedia/pdfs/signpostqualresearch.pdf](http://www.food.gov.uk/multimedia/pdfs/signpostqualresearch.pdf))
24. Larsson I, Lissner L. (1996) The Greek Keyhole nutritional campaign in Sweden – do women with more knowledge have better dietary practice? European Journal of Clinical Nutrition. 50: 323-28

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[www.food.gov.uk/foodlabelling/signposting/alt](http://www.food.gov.uk/foodlabelling/signposting/alt)
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[http://www.which.co.uk/files/application/pdf/0504menus\\_rep-445-55386.pdf](http://www.which.co.uk/files/application/pdf/0504menus_rep-445-55386.pdf)
32. *Occupation Groupings: A Job Dictionary*, 5th ed, 2003 published by The Market Research Society (MRS)

#### Other documents referred to during the course of the discussions

- Levy AS, Stokes RC (1987): Effects of a health promotion advertising campaign on sales of ready-to-eat cereals. *Public Health Reports* 102:398-403.
- EUROBAROMETER – European consumers' attitudes on product labelling – May 2005  
[http://ec.europa.eu/comm/consumers/topics/labelling\\_report\\_en.pdf](http://ec.europa.eu/comm/consumers/topics/labelling_report_en.pdf)
- IGD The Best Practice Guidance on the Presentation of Guideline Daily Amounts (2006)  
<http://www.igd.com/CIR.asp?menuid=36&cirid=1887>
- WHO Strategy on Diet, Physical Activity and Health  
<http://www.who.int/dietphysicalactivity/en/>
- Food portion sizes Compiled by A. Mills and S. Patel 2nd edition - MAFF

#### Additional material – Presentations to the discussion group

- Presentation by FSA
- Presentation by CLCV
- Presentation by Unilever
- Presentation by ASDA
- Presentation by TESCO

## ANNEX C

### SOCIAL GRADES CLASSIFICATION (UK)

Social Grade is the 'common currency' social classification (the 'ABC1' system) used in the UK<sup>33</sup> by the advertising industry and employed throughout marketing and market research. The classification assigns every household to a grade, usually based upon the occupation and employment status of the Chief Income Earner, but in some cases using other characteristics.

#### **Social Grade A (approx 3% of the population)**

Professional people, very senior managers in business or commerce, top level civil servants or retired people previously graded A and their widows.

#### **Social Grade B (approx 20% of the population)**

Middle management executives in large organisations with appropriate qualifications, principal officers in local government and civil service, top management or owners of small business concerns, educational and service establishments or retired people previously graded B and their widows.

#### **Social Grade C1 (approx 28% of the population)**

Junior management, owners of small establishments, and all non-manual positions or retired people previously graded C1 and their widows. Jobs in this group have very varied responsibilities and educational requirements.

#### **Social Grade C2 (approx 21% of the population)**

All skilled manual workers and those manual workers with responsibility for other people, retired people previously graded C2, with pensions from their job or widows if receiving pensions from the late partners job.

#### **Social Grade D (approx 18% of the population)**

All semi skilled and unskilled manual workers, and apprentices and trainees to skilled workers, retired people previously graded D, with pensions from their job or widows if receiving pensions from the late partners job

#### **Social Grade E (approx 10% of the population)**

All those entirely dependent on the state long term, through sickness, unemployment, old age or other reasons, those unemployed for a period of 6 months (otherwise classify on previous occupation) or casual workers and those without regular income. Only households without a chief wage earner will be coded in this group.

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<sup>33</sup> *Occupation Groupings: A Job Dictionary*, 5th ed, 2003 published by The Market Research Society (MRS)

## ANNEX D

### METHODOLOGY OF THE RESEARCH CARRIED OUT ON DIFFERENT SIMPLIFIED SCHEMES

*Presentations are available on the BEUC website*

#### D1. FSA

The FSA adopted a three-stage research approach into simplified labelling consisting of 4 research studies (3 qualitative and 1 quantitative):

#### **Stage 1 - 'Concept Testing of Alternative Labelling of healthy/less healthy foods' (published November 2004)**

##### Research Objectives

The primary research objectives were:

- To establish which one or more of the signposting concepts consumers found preferable and most useful in terms of determining healthier choices
- To establish how each performs in terms of consumer understanding
- To understand the strengths and weaknesses of each concept, and guidance on those option(s) most likely to be effective (with the possibility informing choice of options for inclusion in quantitative research)

##### Methodology

A large-scale qualitative study was undertaken for this stage of research. 20 groups discussions (6-7 respondents in each) were held with adults and 4 mini friendship groups (3-4 respondents in each) were held with young people aged 16-18. Fieldwork was conducted from the 20th September to 11th October 2004.

##### Sample

Full details on the composition of each group can be found in the report (see link below). In summary the research sample was split by the following:

- Age/Life-stage  
The sample was structured by life-stage as it was felt that this would be a primary factor affecting attitudes to diet and health.
  - Young People aged 16-18
  - Adults, aged 18 – 65 + spread across the following life-stages:
    - single or married / cohabiting, no children 18-34
    - older and younger families 20-44
    - empty nesters 45-64
    - retired 65 +
- Socio-economic Group (SEG)

Groups covered respondents from groups B, C1, C2, D and E with a particular focus on those from the lower groups C2, D and E.

- Location

Discussion groups were held in the following locations:

- England, - South, Midlands, North
- Scotland
- Wales
- Northern Ireland

#### Stimulus material used

Five alternative labelling concepts were put into research, each shown on 6 different food products:

- 1) 3 band system 'Simple Traffic Light' (Chicken Wrap, Ready salted crisps, Chocolate coated cereal, Frozen peas, Processed cheese spread, Orange juice)
- 2) 5 band system 'Extended Traffic Light' (Egg salad sandwich, Carbonated Soft Drink, Processed Cheese, Cereal bar, Roasted peanuts, Pork sausages)
- 3) 'Healthy logo' (Wholegrain cereal, Retailer 'healthy option' chicken ready meal, Diet soft drink, Dried Apricots, Fat free fruit yoghurt, Pre-packed tuna salad)
- 4) 'Key Nutrient' (Breaded fish shapes, 99% fat free cereal, Fromage frais multipack, Prawn mayo sandwich, Citrus juice drink, Chocolate biscuits)
- 5) 'GDA Key Nutrients' (Fruit cereal bar, Savoury rice cake snack, Chicken and chips ready meal, Cheddar cheese, Milkshake, Cornish pasty)

Respondents saw the concepts on the above range of example products, printed actual size on stiff board

For a full report which includes the recruitment questionnaire, full discussion guide and concepts shown please see:  
<http://www.food.gov.uk/multimedia/pdfs/alternlab.pdf>

### **Stage 2 - 'Signpost Labelling - Creative Development Of Concepts' (published March 2005)**

Following the publication of results from the stage 1 research, manufacturers and retailers voiced concerns over the design of one of the concepts used in the research. They felt that consumers' antipathy towards the GDA option could be explained in part by the design itself, which they felt could be improved upon. A second stage of qualitative research was therefore commissioned to explore further a range of GDA concepts.

#### Research Objectives

The primary research objective was to inform the design of the GDA executions to take forward into further quantitative research.

#### Methodology

Six qualitative group discussions were held for this stage of research. Fieldwork was conducted from the 10th to the 14th February 2005.

### Sample

The sample was again split by life-stage, location and socio-economic group as follows:

Age 25-44, older and younger families - 3 groups:

- 25-34, 1 x female C1C2
- 35-44, 1 x female C2DE, 1 x male C2DE

Age 45-64, empty nesters, singles or couples with no children - 3 groups:

- 45-54, 1 x female C2DE,
- 55-64, 1 x female C1C2, 1 x male C1C2

All respondents had main or in the case of the men, some, responsibility food shopping. Fieldwork was conducted in 4 locations in the South-Eastern and Midlands regions of England.

### Stimulus material used

In total 10 signposting concepts were tested in this research:

Five alternative GDA concepts were tested in this stage of research alongside the GDA concept from the first stage of research.

1. Roundels showing individual key nutrients signposted with GDA information (as used in original research. No colour coding or indication of high, medium or low ratings)
2. Table showing key nutrients signposted using GDA information (without colour coding or any indication of the high, medium or low ratings).
3. Bar chart showing % contribution of key nutrients to GDA (without colour coding or any indication of the high, medium or low ratings)
4. Bar chart (with max. 50% scale) showing % contribution of key nutrients to GDA (without colour coding or any indication of the high, medium or low ratings)
5. Bar chart showing % contribution of key nutrients to GDA with colour coding indicating high, medium and low
6. Table showing key nutrients signposted using GDA information with colour coding indicating high, medium and low

The opportunity was also taken to consider alternative executions of Simple Traffic Light and Multiple Traffic Light concepts which had performed strongest in stage 1 research to further inform their development. However, these executions were given lower priority in the research, both in the time allowed for their discussion, and in that they were always introduced last.

All concepts tested are reproduced in the full report which also includes the recruitment questionnaire and full discussion guide:

<http://www.food.gov.uk/multimedia/pdfs/signpostingnavigatorreport.pdf>

Respondents saw the concepts on a range of example products, printed actual size on stiff board. The example products were chosen from a range of food and drink categories, and were representative of the broad spread in nutrient contents found across current products on the market.

### **Stage 3a - 'Quantitative Evaluation of Alternative Food Signposting Concepts' (published November 2005)**

A large-scale piece of quantitative research was commissioned by the FSA for this piece of research.

#### Research Objectives

The primary objective of this research was to quantitatively assess the performance of four signposting concepts identified as strongest from the first 2 stages of research. Consumer preference was also explored though the focus of the research was on performance.

#### Methodology

Quantitative research was conducted using an interviewer administered hall-test methodology, with a total of 2,676 interviews conducted across England, Scotland, Wales and Northern Ireland in June 2005. Within this, two additional hall days were conducted in areas where there is a large population of the main ethnic minority groups to ensure that a large enough sample of these groups was interviewed to allow for separate analysis.

A hall test methodology was chosen due to the large amount of stimulus material respondents were required to look at which made in-home interviewing unfeasible.

Hall tests were conducted in central locations, with interviews lasting around 25 minutes.

#### Sample

2676 respondents were interviewed across the UK. The sample was designed to be representative of the UK population, however the number of interviews in Northern Ireland and Wales was boosted in order to allow for separate analysis of these countries.

This sample of 2,676 respondents constituted a representative sample of the UK population of 16-70 year olds, with quotas set on gender, age, working status and socio-economic group. In addition, a screener was imposed to ensure that only those with sole or joint responsibility for the main grocery shopping were invited for interview.

The sample size allowed for robust sub-group analysis by age group, socio-economic group, working status and geographical location.

The data was weighted at the analysis stage according to the profile of the UK population (target quotas) on the above demographics, as well as on country (England, Scotland, Wales and Northern Ireland) and ethnic origin (white and non-white).

It was important to design the research to ensure that the results could be assessed according to the application seen by each respondent first (the monadic evaluation) in order to check that no bias was caused according to what concept was seen first. The results for each treatment were also

analysed according to the total number of respondents who saw it (regardless of the order in which they were seen). The need for analysis of monadic results also drove the need for a large sample size.

#### Stimulus Material used

The decision was taken that the signposting concepts and products without signposting should be tested in a way that replicated reality as far as possible. It was therefore decided that the signposting should be tested using real products as stimulus. Products were purchased during April 2005 from retail outlets in central London. Life-sized photographs of the products on A3 and A4 card were used as stimulus. The front of the cards bore a photograph of the front of the product and the rear side of the cards bore a photograph of the rear part or side of the product that featured the nutritional panel, allowing respondents to refer to this during the evaluations.

The signposts on the product photographs were consistent with the nutrient content of the product in question, and were consistent in size across similar products and were scaled in proportion to the product size.

The four signposting concepts assessed were:

- Simple Traffic Lights
- Multiple Traffic Lights
- Colour-coded GDA
- Monochrome GDA

In addition, actual food packaging with no front of pack signposting was included.

The five alternative formats (four signposting and products without signposting) were applied to five different product categories (three examples of products per category):

- Cereal bars/breakfast cereals
- Ready meals
- Chicken burgers/pizzas
- Pasta ready meals/curry ready meals
- Cake/crisps

The categories were chosen in order to ensure that the signposting concepts were evaluated on a broad range of composite products with differing nutrient levels. Each product category comprised three examples of similar products, the first product was used in the Individual Product Evaluations and the remaining pair used in the Comparisons of Two Products.

#### Questionnaire

The questionnaire was designed in a way to test the performance of each of the 4 concepts in as fair a way as possible. It is important to note that no instruction on the use of any of the concepts were given to respondents during the interview.

The interview was divided into three sections:

1. Performance of signposting concepts/products without signposting
2. Preference of signposting concepts/products without signposting and diagnostics on preference.
3. Application of signposting and background information on respondent's current nutritional awareness and diet.

The performance section of the interview consisted of the following:

- Individual Product Evaluations: Perceptions of the amount of two of the four nutrients most relevant to the product type in question (of fat, saturated fat, salt and sugar) contained in the product in terms of whether it is high/medium/low. (Repeated for five individual products).
- Comparison of Two Similar Products: Perceptions of which of two products of the same type contained the higher amount of the same two of the four nutrients most relevant to the product type in question (of fat, saturated fat, salt and sugar), or whether both products contained the same amount (repeated for five paired products).

Respondents were asked to use the information on packs when answering the performance questions and not specifically the signposting (this however was pointed out when introducing the products with signposting on).

Details of the products used in this research, and the nutrients people were asked about are given in the appendices of the report which can be found at: <http://www.food.gov.uk/multimedia/pdfs/signpostquanresearch.pdf>.

The numerical nutrient content information was used to determine whether a respondent answered correctly during both parts of the performance section of the interview.

Each respondent evaluated each of the signposting concepts and the products without signposting in the performance section before completing the second and third sections of the interview. The questionnaire used in the research is available as an appendix of the report at the link above.

#### Statistical Reliability

Differences between the performance of concepts are only highlighted in the report when **statistically significant**. Any significant differences referred to in the report are at the 95% confidence level. This means that if similar independent samples are drawn from the UK population, a difference of the same magnitude or greater would be expected 19 times out of 20, and that therefore there is only a likelihood of 1 in 20 (5%) that the difference occurred by chance.

### **Stage 3b - 'Signpost labelling Refinement Research' (published November 2005)**

Following on from stage 3a, the FSA commissioned a piece of qualitative research to further investigate issues around consumer use and application of the two signposting formats that came out strongest from the quantitative evaluation at stage 3a. The concepts tested in this research were Multiple Traffic Lights (MTL) and Colour-coded GGA (CGDA).

#### Research Objectives

The primary research objectives were:

- To further explore the application of MTL and CGDA signposting concepts
- To further explore consumer understanding and envisaged use of the schemes
- To aid the development of retailer/manufacturer guidance for the application of signposting in the UK.
- To explore the scope and nature of any consumer education that might be required to accompany the introduction of a signposting scheme in the UK.

#### Methodology

In total, 16 qualitative discussion groups (with 7-9 respondents in each) were conducted across the UK. The fieldwork was conducted between 12th July and 1st August 2005.

#### Sample

The sample consisted of adults 18+ in the UK. Respondents all had main or joint responsibility for the household food shopping, and the sample profile was designed to broadly reflect the UK population with the two key criteria for the group composition being *life stage* and *Socio-Economic Grouping (SEG)*.

#### Stimulus Material

Respondents were shown both concepts on the same stimulus material as used for Multiple Traffic Lights and Colour Coded GDA in stage 3a. In addition they were shown picture boards containing photos of different foods from product categories to help them in exercises concerning the prioritisation of foods for signposting. Real food packaging was also used to help consumers imagine how signposting could apply to a wide variety of packaging types and sizes.

## D2. Unilever

### STUDY 1

Unilever tested six systems: Multiple Traffic Lights, Wheel of Helath, 1-5 Stars, 1-5 Smileys, Healthy Choice Tick, Helath Protection Factors.

#### Method

Participants, Design etc.

As study 2 (below) – with the following minor differences.

Sample:

In total 1630 consumers from four European countries participated in this study, 316 participants from the United Kingdom, 447 participants from Germany, 430 participants from Italy and 437 participants from the Netherlands

Assessments:

- No 'pre-labelled' measures of health perception and choice included.
- Assessment of choice: buying intention instead of usage intention.

### STUDY 2

#### Method

Participants

In total 776 consumers from two European countries participated in this study, 405 participants from the United Kingdom and 371 participants from Italy. Results of the first study had shown that there were no major differences between countries; therefore, we did not include Germany and the Netherlands in this study.

Consumers were recruited across four different age groups: 18-24 years, 25-34 years, 35-45 years and 45-55 years, across gender and across education levels. Participants were members of a SSI/Bloomerice online consumer panel.

Design

The study was conducted on-line. Each participant received a personal code to log on to the on-line survey. Two different methods were used to test the nutrition labelling formats.

In the first method nutrition labelling formats were presented per product pair (comparison of a healthier and less healthy product). In the second method, 12 products were presented on a single collage. Formats were randomly assigned. A 4 (Labelling Format: Healthier Choice Tick, Multiple Choice Tick, Stars, GDA scores) x 2 (Product Category: Ice-cream, Spreads) x 2 (Healthiness of Product: Healthier product, Less Healthy product) within subject factorial design was used with Countries as a between subject variable (UK, Italy). Consumers could access back of pack information (full nutritional table) by clicking on a button on the screen. In addition the time participants took to evaluate each format was measured. Each cell contained approximately 160 participants.

The second method (shopping basket) was used in a one factor design. The factor was type of nutrition labelling format (the 4 different formats). The nutrition labelling formats were presented on a collage of 12 products to imitate a shopping situation. Five product categories were included (i.e. ice-cream, cola, peanuts, pastries and snacks) and two filler products were used (i.e. soup and an apple).

Depending on the labelling format the 12 products were ordered into 2, 3 or 5 categories with per group the appropriate labelling format. GDA scores were presented on each product separately.

Participants were randomly assigned to 2 out of the four front-of-pack nutrition labelling formats. After exposure to the labelling formats in both methods, participants answered questions on liking and comprehension of the labelling format.

### Procedure

To obtain a baseline measurement participants were first exposed to a list of 12 products without a nutrition labelling format and were asked how often they used each product followed by how healthy they thought each product was.

Subsequently the participants were asked to complete a number of questions regarding demographics, health behaviours, health attitudes and nutritional knowledge.

Participants then received the first test (product pair), which was identical to the procedure in the first study. Participants answered questions on liking, perceived healthiness, usage intention and usage frequency.

When participants finished this part of the test they were exposed to a collage of pictures of products that varied from healthy to less healthy products. After exposure to each product collage, participants answered questions on comprehension and liking of the labelling format. Subsequently the unhealthy products that were used at least once a month by the participant accompanied by the healthier version were shown. Participants answered questions on perceived healthiness, usage intention and usage frequency intention for both products.

### Measures

#### *Consumer friendliness measures*

Liking was measured by the question, 'How much do you like the health indicator on this product'. Participants rated their liking of the specific nutrition labelling format on a five-point Likert scale ranging from 1 (do not like it at all) to 5 (like it extremely). Comprehension was measured by the question, 'How difficult or easy is it for you to understand this health indicator'. Participants rated their comprehension of the specific nutrition labelling format on a five-point Likert scale ranging from 1 (very difficult to understand) to 5 (very easy to understand). Credibility was measured by the question, 'How credible is this health indicator to you'. Participants rated credibility of the specific nutrition labelling format on a five-point Likert scale ranging from 1 (not at all credible) to 5 (extremely credible).

### Perceived Healthiness measure

The purpose of a nutrition labelling format is to differentiate between healthier and less healthy products. Perceived healthiness of the product was measured by the question, 'How healthy is this product to you?'. Participants rated perceived healthiness of the product on a five-point Likert scale ranging from 1 (not healthy at all) to 5 (very healthy).

### Baseline measures

To assess current usage and perceived healthiness of the products without a nutrition labelling format, participants were asked 'How often do you usually eat or drink this product?' - before they were exposed to any of the formats. Participants rated their usage on a seven-point scale ranging from 1 (less than once a month), 2 (once a month), 3 (two or three times a month), 4 (once a week), 5 (two or four times a week), 6 (almost daily), 7 (several times a day). For the analysis the scale was converted to times per year. Subsequently participants were asked 'How healthy is this product for you?'. Participants rated perceived healthiness of the product on a five-point Likert scale ranging from 1 (not healthy at all) to 5 (very healthy).

### Behavioural impact

Perceived impact on behaviour was measured by two questions, 'Having seen this product with the health indicator, how often do you intend to use this product?' and 'Having seen this product with the health indicator, do you intend to use less or more of this product?' (For the Healthier Choice Tick, less healthy products were followed by the question, 'Having seen this product without the health indicator, how often do you intend to use this products?' and 'Having seen this product without the health indicator, do you intend to use less or more of this product?'). Participants rated intended usage frequency on a seven-point scale 1 (less than once a month), 2 (once a month), 3 (two or three times a month), 4 (once a week), 5 (two or four times a week), 6 (almost daily), 7 (several times a day). For the analysis the scale was converted to times per year. Intended usage change was rated on a five-point scale ranging from 1 (much less) to 5 (much more).

The effect of a product with a logo compared to a product without a logo was assessed as follows: the assessment without a logo was subtracted from the value with the logo.

### D3. ASDA Walmart

Asda Qualitative research

Front of pack nutritional signposting

Recruitment criteria:

- 6 x 1 ½ hour groups with female respondents
  - BC1C2 spread across each group
  - In each group 2/3 ASDA primary shoppers and 1/3 ASDA secondary shoppers
- Primary ASDA shoppers were Tesco/JS secondary shoppers  
 - Secondary ASDA shoppers were primary Tesco/JS secondary shoppers

They agreed that:

- They see health for selves and family (if relevant) as very important or quite important
- They read nutritional labeling on packs when making food/drink purchase decisions

Group	Location	Age	Lifestage
1	South	25 – 35	Children at home – spread ages
2	South	36 - 45	Older children at home – spread ages
3	South	46 – 60/5	Older children and empty nesters
4	North	25 - 35	Children at home – spread ages
5	North	36 – 45	Older children at home – spread ages
6	North	46 – 60/5	Older children and empty nesters

Consumer awareness of info on pack

- Aware that information may be on face or reverse of pack
- But approved of proposed increase in front of pack info – easier to see at glance and compare
- In ideal world would be able to compare info across brands/own label ranges across retailers
- Identify/value moves to provide more prominent/simplified pack info
  - e.g. cereal – green strips
  - grading of cheese and of wine
  - M&S 'no added' initiative

Where do customers get information from?

- Info re what to look out for from variety of sources:
  - Friends
  - Children
  - Weight Watchers etc
  - magazines, women's pages/newspaper
  - Magazine TV shows – e.g. Richard and Judy and This Morning
  - ads (e.g. Jaffa cakes 1g fat)
  - health professionals.
  - Also some experience of colour coding on school lunch menus (a positive move – welcome similar on packs to help educate children

and back up argument – *you cant have any more of that – look at all the reds in it).*

Do customers understand nutritional information?

- Although recruited as 'label interrogators'/information seekers, levels of understanding and actual knowledge varied across the sample
  - Minority able to quote accurate facts/figures
  - Some not familiar with grammes (esp. older groups)
  - Many not able to understand %. Often 'converted' to closest fraction to help visualise
  - Confused audience – a simple colour coded system potentially helping to clarify purchase decision making
- Some issue as to who set GDA and differing levels of suitability for small female through to large male amongst minority
  - Ideally some clarification on reverse of pack to convince the most interested/cynical

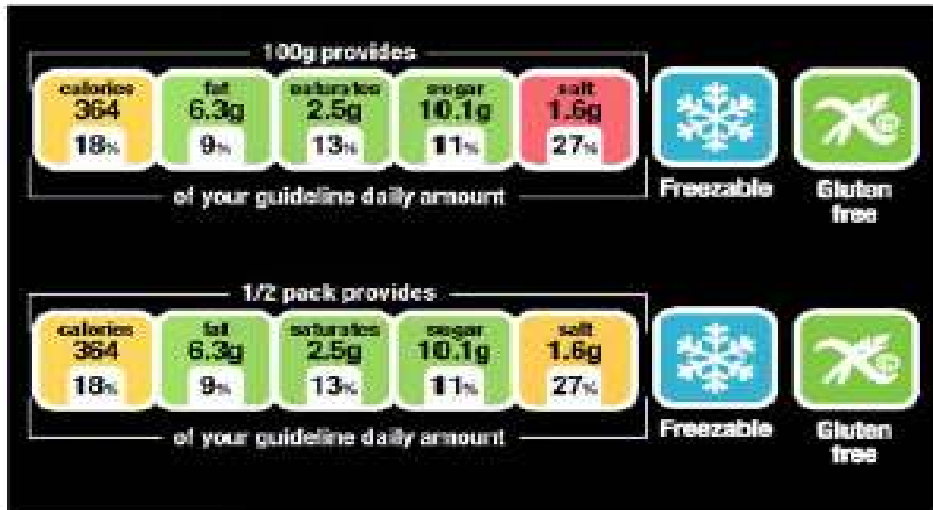
Is information per serving or per 100g most useful to consumers?

- Although minority keen to see 'per 100g' on face of pack, majority of the sample (mostly spontaneously) preferred and/or requested clear per *realistic* serving information (at this point, regardless of colour coding)
  - Clear - e.g. per wrapped biscuit, per piece of chicken, per truffle
  - Realistic - not tiny/underestimated, but for 'real people'
- Argument for
  - 100g (by minority) - Likely to be easy to compare across brands/own label
  - Per serving
    - Simple/easy to interpret. Instant - no need to calculate.
    - And seemed more honest to many – with proviso that should be realistic serving as mentioned above

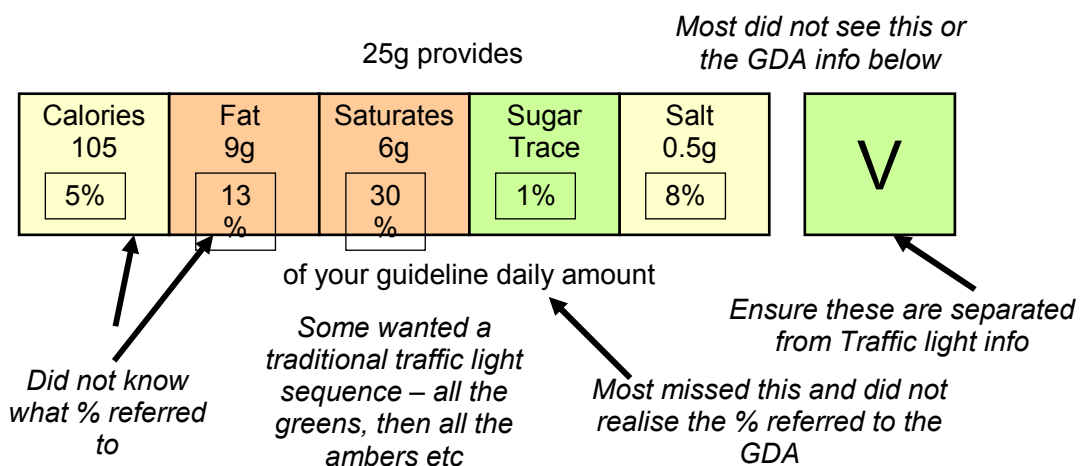
Is Information per serving or per 100g most useful to consumers?

- Prepared to argue for Per serving, even when spontaneously noticed/prompted to see that some products would appear more orange/red in a per serving format
  - Some things you just know will be more reds than anything else like cheese and crisps, but everything in moderation – you can't cut everything out
  - Per 100g makes it harder for you
  - They need to have it clear like per pack or per half a pack
  - Even if it is all red it won't stop me eating it. I will just know I have to be good the next day
  - Per serving is straightforward and easier. I don't even work in grams I work in pounds and ounces still
  - Realistically you aren't going to eat a 100g of a lot of things so it doesn't help

Proposed ASDA labelling. Regardless of 100g/per serving - did they 'get it'?



Proposed ASDA labelling. Regardless of 100g/per serving - did they 'get it'?



### Calorie coding

- A very mixed response to calorie colour coding across the sample an especially emotive issue for the mid age group in the sample
  - Younger women interested in guidance for themselves
  - Those with teenage children/some older women concerned that some foods which were still 'good for you', could appear high in calories/red and hence inflate pressure on teens
- Concerned as to what basis this calorie rating was based on – RDAs known to vary 1500, 2100
  - Everyone is different on calories too – for a 15 stone man to a 5 stone girl.
  - At what point does someone decide what calories are bad for you?
- When calories presented as white
  - Misleading

- appeared to be a 4 point scale with white interpreted as the safest/lowest count
  - or black text interpreted as danger/bad
- Illogical – no fit with the traffic light system
- Error - *It looks as if it is not printed properly*
- Solution may be to diffuse the argument amongst parents of teenagers and employ another non traffic light colour
  - No guidance
  - But clear information

#### Asda Quantitative research

##### Based on

- 1000 in depth telephone interviews
- Selected as representative sample of Asda shoppers UK wide

##### Face to face store exit interviews:

- 400 in depth exit interviews - 4 stores two heartland, 2 new territory
- Representative sample by demographics, day of week, time of day, basket size
- Carried out in May 06

If Asda provided nutrition information on the front of the package of food products (e.g. fat content, calories, salt content etc) would you prefer that information related to the portion size or per 100g?

##### Response:

- |                           |       |
|---------------------------|-------|
| • By portion size         | 60%   |
| • By 100g                 | 22.9% |
| • Dependent on product    | 3.9%  |
| • Don't know / don't mind | 13.2% |

Female customers with children have the highest preference for per portion (64.4%)

18–24's and 65+ had least preference as whether per portion or per 100g (30% and 27.5% respectively)

##### Where customers thought best to learn about on pack initiatives?

- Variety of different locations suggested by respondents
- Most popular through to least presented below
  - On trolley - to familiarise with the symbols/initiative
  - Shelf barkers – to remind to look
  - Posters in store - to explain in some depth
  - ASDA magazine – symbols and to explain in more depth
  - Other magazines via PR to announce initiative
  - Outside store/TV – to announce initiative/positive PR
  - Credit card sized info for minority (especially older) to act as aide de memoir
  - Leaflet for minority – most thought unlikely to keep/read

- Although brief Sainsbury's leaflet liked when reviewed in research
- If ASDA to follow, ensure that not weighty/heavy, but similar tone to JS?

### Conclusions

- Do customers prefer ASDA colour coding to be on a 'per 100g' basis or on a per serving basis?
  - on a per serving basis
- Do customers want our colour coding to be % tint or red, amber and green?
  - red, amber and green
- How may this influence their purchase and perception of ASDA?
  - May temporarily be put off some foods, but also positively surprised about others
  - Unlikely to go elsewhere for same product – might buy alternative items in ASDA – from same range/from competitive range.
  - Would value ASDA as open, honest and educating

#### D4. Tesco

Tesco's research takes several forms:

- Monitoring Customer queries and complaints via stores and our Customer Helpline.
- Customer Question Times (CQT's) which help us to identify and respond to changing customer needs. These meetings enable staff and senior managers to hear customers' views on everything from how we are serving them to our role in the community. This year we held 256 CQTs in the UK, involving 8,000 customers.
- Focus Groups – which could be based on loyal Tesco Customers, these help us explore key issues raised by the above.
- Every year we carry out some strategic pieces of research to help direct our Customer and Community Plans for the following year(s). We use Triads (1 researcher to 3 customers) to help us explore the issues in more depth whilst allowing discussion within the group on the decision making processes. This is particularly important for Health where everyone has their own agenda. This sort of research can be very powerful -quantitative questions may not get the right detail and focus groups may smother individual views.
- Hall Tests – we use these when we need to check a very simple specific issue and to get some quantitative data.

Tesco looked at various labelling options using focus groups. Proposals for a more graphical representation of nutrition information such as Bar Charts were rejected as being too scientific and confusing but when we presented a Traffic Light option the customer response was positive, it was front of pack, simple and answered the question "Is it good for me?"

Further exploration at some of the issues highlighted some key deficiencies. There were some anomalies in how products fitted into the bandings so it was decided to review the basis for the criteria i.e. moving from CPG energy based ones to "a lot" and "a little". The range of products, which fell into the red, amber and green bands, was unbalanced - very few green and early indications were that customers weren't using amber to help in decisions. The power of Traffic Lights was mainly directional and there was very little understanding of how they worked.

Ongoing focus groups looking at some of the decision-making using the labels found that: for some consumers Red meant stop/danger rather than warning and one red on the label impacted all nutrients. Customers didn't know how to respond to Amber and with a lot of products with amber that meant the labelling was ineffective. Customers thought the labelling was too simple - didn't allow for the positives in food e.g. micronutrients. The Bands were too wide which masked product differences especially within categories and customers didn't understand why.

Customers started to say they did not want coding they wanted the straight facts about nutrition. They were sceptical of a coded system fearing companies, government would manipulate such a system for their own ends. Customers said they would not engage with the actual nutrient levels and consider their individual needs, but rather navigate using the colours only.

Further options were explored to try and address the deficiencies whilst keeping the positives and resulted in Tesco's current choice of front of pack labelling.

Further focus groups thought of the Tesco's signposting that it is clear and simple, visually appealing and colours provide standout on pack. It provides info on the five nutrients which customers wanted. The % GDA provides a benchmark to set the grams per serving into context. The more numerate customer can cope with %, and the less numerate use % as a rule of thumb. The labelling is precise and uncoded (and hence trustworthy) and helpful. The grams per serving answered the "what am I eating question?" Customers also said that a % GDA over 30% for snacks and 40% for main meals was seen as significant and a "stop and consider" level.

The final piece of research was a hall test where 308 customers were presented with a labelled pack (no explanation) respondents were interviewed across the three store sites (Cheshunt, Perth and Southport) these were representative of Tesco's customer base in terms of age, sex and class.

- 67% saw the nutritional signposts (unprompted)
- 75% said they would use it on many products (49% all the time)
- 66% recognised the colour coding was for nutrient type not about level (e.g. High)
- 84% said figures in percentages were clear and understandable
- 68% said it was clear and understandable whether the figures were high or low
- 40% recognised %GDA as the amount of salt in a serving
- 21% recognised % GDA as the amount of salt in a serving and related it to daily intake
- 47% said they would consider nutritional information a "lot more"

Research was undertaken to assess the impact on particular sub-groups which the FSA identified as most likely to have a problem with the Tesco signage, namely; older customers (55+), those in Social Groups DE and Ethnic minorities. 306 respondents were recruited to a profile of customers (representative on gender for main shoppers) and all were at least jointly responsible for the food/grocery shopping in their household.

- Around 6% of these subgroups believe they have a problem with understanding the system and 12% with percentages (some are happy to use the number of grams which are also shown).
- GDA performs well amongst those who usually check the labels and generally speaking, those with problems are not the customers who feel a need to check labels.

- For those who had a problem, the size of the writing can be more of an issue than the use of percentages, particularly amongst the older age groups.

Questions Tesco will look to answer in future research

- Is the move to healthier choices seen in ready meals, sandwiches and soups replicated in other product groups?
- Do moves to healthier choices increase as familiarity with GDA Signposts grow?
- How do the different customer segments use the labelling?
  - Partnership with the Pre-school learning alliance - research with parents in deprived areas on how best to help them.

## D5. Sainsbury's

### June 2005

The objective of the research was to capture customers' understanding of the Wheel of Health. Research was conducted in Sainsbury's stores in April 2005. 581 customers were interviewed in 5 stores: Durham, Birmingham, Sheffield, Enfield, Maidstone. This quantitative research was done by intercept interviewing in-store. In addition, there were 20 *vox pop* interviews at ready meals, cereals, crisps and juice fixtures in our London Colney store (North East London). All the research was conducted for us by Ipsos Mori.

The qualitative research found customers divided into two broad groups: those with specific dietary needs (e.g. dieters, diabetics, high blood pressure, high cholesterol) and those with a broad awareness of health issues (for this group, salt and fat were the main interest but sugar was also important for those with children. Both groups liked the Wheel of Health. For the first group, information was needed on specific nutrients; for the second group, low level directional information was needed. The groups were also divided by socio-demographic profile and age.

Respondents were asked to rate the Wheel, and back of pack information according to ease of use: very easy, quite easy, difficult, don't know, and also compare the usefulness of the Wheel versus back of pack. They were asked to rate how influential the Wheel would be in their purchasing decisions and to say if it contained the right amount of information. The level of understanding was probed, e.g. how comfortable were the respondents with using the information, were the nutrients the right ones, did they understand what the wheel really meant?

### May 2006

The research took the form of a mailed questionnaire to 5,000 customers. There was a 64% response rate. The questionnaire covered a number of aspects of shopping at Sainsbury's. Questions specifically on the Wheel of Health asked:

- have you noticed the wheel of health symbol on Sainsbury's packaging?  
Yes : 84%; No : 12%
- would labels like this be useful when you're deciding what to buy? Very useful : 60%; Quite useful : 33%; Not at all (useful) :6%
- Would labels like this influence what you buy? Yes : 79%; No : 19%

The research was conducted for us by an external market research agency.

## D6. CLCV/DGAL

The Direction Générale de l'Alimentation (DGAL), of the French Agriculture Ministry, and the consumers' association Consommation Logement et Cadre de Vie (CLCV) signed an agreement to conduct a study on nutrition labelling and entrusted the supervision of this project to the CLCV.

This study is part of the recommendations of the "nutrition labelling" working group of the French Conseil National de la Consommation (CNC)<sup>34</sup>.

As defined in the agreement, a steering committee representing all the groups involved in the CNC has been created in order to do the following:

- specify the exact aims of the study;
- define the methodology;
- finalise the study tools (questionnaires and booklets);
- define a plan for analyzing the data; and
- finalise the results and conclusions.

This steering committee comprises the following members:

- Charles Pernin (food project leader at the CLCV)
- Nicolas Canivet (DGAL)
- Ambroise Martin (expert nutritionist and nutrition professor at the Lyon 1 University)
- Annie Loc'h (ANIA and the Danone Group)
- Brigitte Pouyet (head of nutrition at the Direction Générale de la Consommation de la Concurrence et de la Répression des Fraudes)
- Alexander Rogge (Fédération du Commerce de Détail)
- Sandrine Bize (Confédération générale de l'alimentation de détail)
- Béatrice Sennemaud (Direction Générale de la Santé)
- Jean-Luc Volatier (Agence Française de Sécurité Sanitaire des Aliments)

The committee met six times from September to May 2006.

### **The aims of the study**

The following goals were agreed by the steering committee:

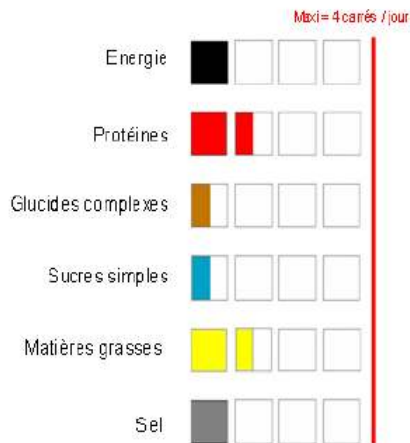
- To understand the expectations of consumers in the area of nutrition labelling
- To test their effective understanding of the two labelling systems: "Gerbaulet" and "Nutriments".

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<sup>34</sup> The Conseil National de la Consommation is a dialogue body led by the Ministry for the Economy. It brings together economic operators and representatives of consumers and administrations.

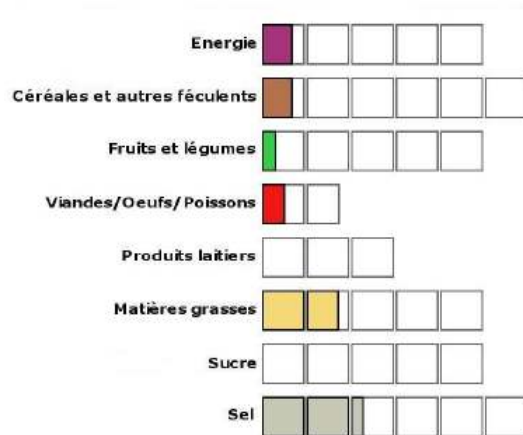
## Nutriments

Par rapport à vos besoins journaliers, une portion vous apporte :



## Gerbaulet

Par rapport à vos besoins journaliers, une portion vous apporte :



Nutriments	Gerbaulet
<i>maximum = 4 squares per day</i>	
Energy	Energy
Proteins	Cereals and other starches
Complex carbohydrates	Fruit and vegetables
Simple sugars	Meat/eggs/fish
Fats	Dairy products
Salt	Fats
	Sugar
	Salt

In order to minimize the bias arising from the differences in the labelling format and aspect, it was decided to standardize the graphic presentations.

In addition, comprehension of the labelling was evaluated before and after a brief explanation by the investigators.

- Describe the consumers' perception of these two systems and compare it with their perception of the current system.
- Evaluate their perception of a green traffic light for products with a high nutritional value:



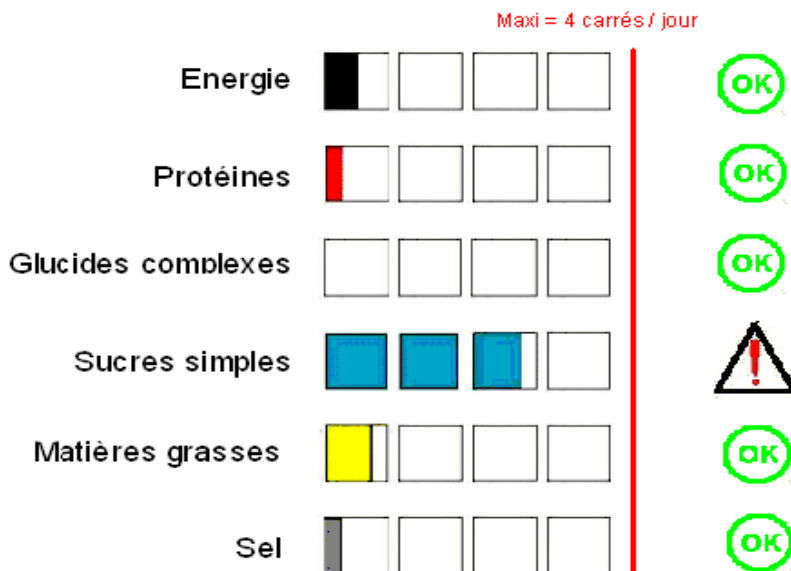
Eat as much as you want

- Evaluate their perception of a red traffic light for foods with a low nutritional value:



Eat infrequently

- Evaluate their perception of complex traffic lights used to complement the tested labelling:



	Maximum = 4 squares per day
Energy	
Proteins	
Complex carbohydrates	
Simple sugars	
Fats	
Salt	

- Gather individual socio-economic data in order to highlight any correlations with the responses to the labelling.

## **Methodology**

### The structure of the questionnaire

Questions 1 to 5	Evaluate the interviewee's general interest in nutrition (questions already asked during a CLCV survey in 2004 concerning labelling notes)
Questions 6 and 7	Expectations concerning labelling
Questions 8	Comprehension of the nutrients or Gerbaulet labelling prior to the explanation
Questions 9	Comprehension of this same labelling after the explanation
Questions 10	Practical test of labelling on two products
Questions 11 to 13	Perception of the proposed labelling: whether it is comprehensible, contains an excess or a lack of information, and the declared impact on eating habits
Questions 14 to 15	Comparison between the proposed labelling and the current labelling
Question 16	Is labelling compulsory?
Question 17	Desired location of labelling
Question 18	The case of non-packaged products
Question 19	Tests of the traffic lights
Questions 20 to 30	Socio-economic data

### The surveys

The study included a sample of 1,224 persons and was structured according to the quota method and the INSEE<sup>35</sup> data base. In order to limit the length of the interviews, 617 were questioned on nutrition labelling and 607 on the Gerbaulet labelling.

The pollsters from the CLCV questioned consumers during 15-minute individual interviews.

Some questions required the use of product examples, e.g. pre-cooked dishes, desserts, etc. For that purpose, the pollsters had colour-illustrated booklets to show to the interviewees.

Nearly all the questions were closed and the responses were recorded by the pollsters.

### Data analysis

A data analysis plan was established by the steering committee and was used as a basis for the statistical exploration of the results. The recording and statistical processing were entrusted to SPAD, a specialized consultancy.

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<sup>35</sup> Institut National de la Statistique et des Etudes Economiques

### The study's stages

All the stages of the study, shown below, gave rise to abundant exchanges among the members of the steering committee and were finalised at a committee meeting.

September 2005 to February 2006	- Definition of objectives and methodology - Choice of the systems to be tested - Development of survey tools
February 2006	- Pre-test with 17 people by three pollsters from the CLCV
February to March 2006	- Correction and simplification of the survey tools based on the results of the pre-test
April 2006	- The 1,224 surveys were carried out
May and June 2006	- Statistical processing - Presentation of results to the steering committee and to the CNC and the media.

## **Results**

### Comprehension

- Prior to the explanation, around 30% of consumers had a good comprehension of the systems' detailed logic. These percentages were as high as 47 and 48% after the explanation.
- For nutriments, the proposed very brief explanation had a significant impact, although not decisive, on the comprehension of the labelling:

<b>Type of responses</b>	<b>Variation between questions 8 and 9 (for "nutriments")</b>
Perfect responses	Significant increase
Good responses	Significant increase
Intermediary responses	Significant fall
Bad response	Insignificant fall

For the Gerbaulet system, the explanation had a paradoxical effect in that it increased the number of bad responses. It therefore appears that the logic of the system is more difficult to explain than that of the "nutriments".

<b>Type of responses</b>	<b>Variation between questions 8 and 9 (for "Gerbaulet")</b>
Perfect responses	Insignificant increase
Good responses	Significant increase
Intermediary responses	Significant fall
Bad response	Significant increase (!)

- The description by persons who gave correct responses shows that **the** logic of the labelling is better understood by young people and/or those with a good level of education.
- This labelling enabled a very large majority of consumers (83 to 85%) to identify when the RDA (recommended daily allowances) had been exceeded (see Q10).

#### Perception of labelling

The proposed systems were deemed understandable by 61% of the persons questioned (66% for “nutriments” and 57.7% for “Gerbaulet”).

Around 55% of consumers felt that the proposed labelling provided sufficient information and 56 to 57% felt that the labelling could induce them to change their eating habits.

#### Comparison with the current system

The proposed systems were preferred over the current system. Around 58% of consumers felt that the proposed systems were better for comparing products. Between 75 and 78% of them thought that this labelling, alone or in conjunction with current labelling, would be useful for establishing a better balance in their diet.

#### The compulsory aspect

Between 91 and 92% of consumers asked for this labelling to be compulsory.

#### Preferred positioning on packaging

	Front	Sides	Back	Indifferent
Gerbaulet	47.7	20.2	14.8	17.3
Nutriments	51.7	15.4	14.5	18.3
Average	49.7	17.8	14.65	17.8

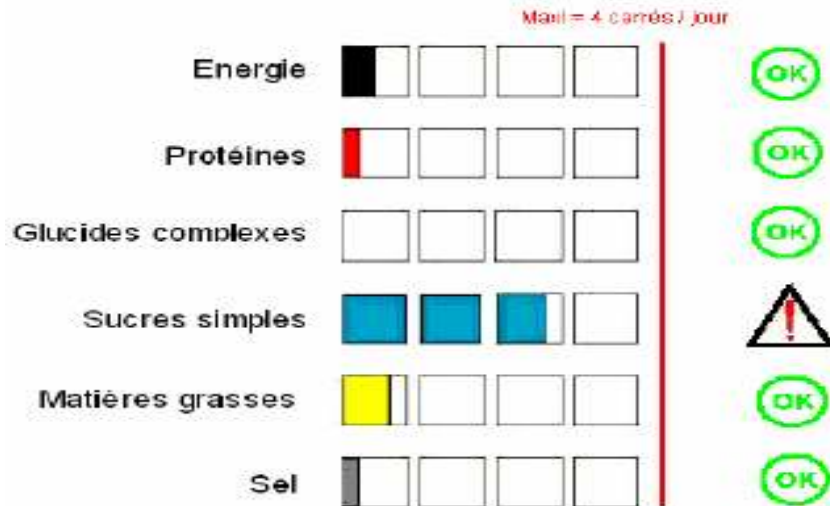
⇒ The majority of consumers asked that this labelling be displayed on the front of the packaging.

#### Traffic lights test

Of all the consumers questioned, 54.2% did not want a green traffic light on products with a high nutritional value and 82% did not want a red traffic light on products with a low nutritional value.

⇒ French consumers rejected a nutritional label consisting only of a traffic light that provides an overall judgement of the product.

On the other hand, around 61% of consumers favoured multiple traffic lights that would complement the information provided by the proposed labelling:



	Maximum = 4 squares per day
Energy	
Proteins	
Complex carbohydrates	
Simple sugars	
Fats	
Salt	

Lastly, a minority of them, 11%, rejected all three types of logos proposed. This result appears to indicate that the systems that complement factual labelling are perceived as useful.