

Dot points on Front-of-Pack (FOP) food labels

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Evidence-based food labels

There is a consensus that Australia needs evidence-based food labels, and The Food Labelling Law & Policy Review Committee was set up under the chairmanship of Dr Neal Blewett AC, to make recommendations to the Australian and New Zealand Food Regulation Ministerial Council (MINCO) late in 2010 and to the Council of Australian Governments (COAG) in early 2011.

What is evidence?

- Published evidence and common sense are expected to guide the Blewett Committee;
- Political evidence may get close attention at MINCO and COAG.

Published evidence and common sense

- The Australian Bureau of Statistics reported in 2007 that 46% of adults had a degree of illiteracy that was sufficient to disadvantage them;
- Illiteracy is a universal problem—the ABS data formed part of an international study that placed Australia in 5th place worldwide;
- At least 20% of shoppers would not understand FOP labels that use percentages;
- The disadvantaged need FOP labels they will understand at a glance without any explanation;
- The only FOP label that meets these criteria is traffic lights.

Political evidence

- The food industry is Australia's biggest industry, a major contributor to the national economy and major employer of the voting public;
- This industry can afford to maintain a permanent, well-paid and skilled political lobby to look after its legitimate business interests and make politicians fully aware of them;
- The food industry lobby might easily convince COAG (because it may well be true) that a red light for salt on a packet of Kellogg Corn Flakes (advertised for over a century as "healthy") would threaten its present high position in the Top Ten Best-selling Breakfast Cereals;
- The lobby can even say (and a court might support it) that red lights on popular breakfast cereals would contravene the Blewett Committee's Terms of Reference, which require regulatory reforms to *maintain or increase the competitiveness of Australian businesses*;
- The lobby can say (and it may well be true) that a red light for salt would deliver a significant blow to Kellogg's competitiveness;
- The lobby could ask what other purpose a red traffic light is intended to have—shoppers STOP at red traffic lights while driving to a supermarket;
- The lobby could demand a full explanation of what else a red light can ever do except *damage the competitiveness of quite a lot of Australian businesses*;
- The lobby might argue that Cadbury no longer makes its cocoa in Hobart—it is cheaper to use the Cadbury factory in Singapore—so the next to move off-shore might be the Kellogg Corn Flakes factory, which is huge (the Kellogg Corn Flakes factory in Manchester is the biggest in Europe); the lobby could say this might be unavoidable if declining sales dictated a price reduction;
- The lobby would claim that the food industry's alternative FOP label is very good—after spending millions of dollars on it in Europe (the GDA) and Australia (the %DI);
- The industry claims the %DI is more informative than "simplistic" traffic lights, and is rumoured to be persuading the EU to adopt the GDA for that reason;
- COAG could be excused for finding these arguments very persuasive;
- Most politicians would rather have a powerful friend than a powerful enemy;
- COAG might see clearly that traffic lights are far better, yet conclude that—for political reasons—they were a luxury Australia could not afford.

Notes on red lights

- Red traffic light have made food labels one of the most controversial and divisive issues in public health for decades;
- The red light led the food industries of Europe and Australia to invest many millions of dollars in a substitute FOP label without red lights;
- The greatest threat to traffic light food labels in Australia may be the legal question whether *damaging the competitiveness of quite a lot of Australian businesses—its intended purpose—* would mean the red light violated the Blewett Committee’s Terms of Reference;
- Another great threat to traffic light food labels is that in any case the bitter enmity and resentment of mandatory red lights would sour our relationship with the food industry;
- For many decades good progress will depend on the continuing strong support of an industry that has already given us willing collaboration in a common effort for decades.

Notes on the Heart Foundation “Tick”

- The food industry has no problem whatever with the Heart Foundation “Tick”;
- The “Tick” is recognised as an investment—an advertisement that increases sales;
- Food companies willingly pay substantial fees for it;
- Yet the “Tick” is available for foods that are only slightly healthier than the fatty, sugary and salty foods they replace;
- If the “Tick” demanded the radical change that healthy foods will ultimately need in fact it wouldn’t even work (people wouldn’t buy them).

Notes on amber lights

- An amber traffic light is broadly equivalent to the Heart Foundation “Tick”—it is only healthy enough to avoid a red light;
- Mandatory amber lights would be expected to advertise every eligible product just as effectively as the Heart Foundation “Tick”;
- And mandatory amber lights would advertise every eligible product free of charge;
- All that the Heart Foundation claims for the “Tick” is that it will help to *prevent* illness;
- Statistical proof of *prevention* is elusive—we also need green lights for *treatment*.

Notes on green lights

- *Treatment* effects can often be measured in the consulting room within four weeks;
- Quick and measurable results are the reward most patients can expect after making a stricter dietary change motivated by symptoms and medical advice;
- The Heart Foundation itself gives stricter dietary advice for *treatment*;
- The Heart Foundation’s *Guide to management of hypertension 2008* says doctors should recommend their patients with hypertension to choose “*low-salt* and reduced-salt foods as part of a healthy eating pattern”;
- *Reduced-salt* foods normally get the “Tick” (bread for instance can have the “Tick” with a sodium content of ≤ 400 mg/100g), but the Heart Foundation has no “Double Tick” for *low-salt* foods (sodium ≤ 120 mg/100g);
- *Green* traffic lights would have the same meaning as a Heart Foundation “*Double Tick*”;
- With sodium ≤ 120 mg/100g) green traffic lights would fill the vacuum that a “*Double Tick*” should have filled;
- Note that the 3.7 million patients with hypertension are *30% of the adult population*;
- Note also that 90% of the people who survive to middle age on an industrial diet have hypertension before they die—clearly the healthiest foods of all are low salt foods, preferably low in fat, saturated fat and sugar as well (four green lights);
- Everybody could choose *low-salt* foods at a glance if *low-salt* foods simply had *green* lights for salt on the front of the pack;
- In the 1980s there was a growing market for low salt and no-added-salt foods;
- The food industry started catering for this market on a significant scale;

- In 1984 Coles reported that they had started selling *more no-added-salt peanut butter than “normal” peanut butter*;
- The trend didn’t last, nevertheless a few products dating from the early 1980s were still on the market until quite recently;
- In early 2010 shoppers who control their salt intake on medical advice lost an old favourite—Coles no-added-salt sliced beetroot (a product of excellent flavour, on the market for nearly three decades);
- Coles explained that the supplier could no longer make it at the present turnover without a price increase that Coles regarded as too risky—there were not enough customers;
- The question waiting for an answer is whether green traffic light labels could transfer the well-flavoured low-fat, low saturated fat, low sugar and low salt foods from their small niche market into the mass market;
- A positive answer could make Australia a world leader in controlling the modern epidemics of preventable disease.

The price of keeping the powerful friendship of the food industry

- Australia could make friends by accepting %DI labels, the food industry’s substitute for traffic lights, but that would discriminate against all of the under-privileged who don’t understand percentages—20% of the population—and they are the citizens who most need help;
- It would be a deprivation if Australia lost the opportunity to have amber and green traffic lights—a valuable asset to the food industry as well as to public health nutrition;
- Red lights—associated with bitter controversy—would not be a loss;
- Red lights would be equivalent to the Heart Foundation giving a “Cross” to every food not considered healthy enough for the “Tick”—can anybody think of one good reason for demanding that?
- Red lights (the only source of disagreement) are expendable—and a cheap price for the powerful friendship of the food industry.

Two Nutrition Information Panels

• On the left is the NIP Kellogg were using on packets of Corn Flakes in July 2009; On the right is a figure showing the mandatory details that FSANZ requires in the NIP; some details in this figure published by FSANZ were circled for teaching purposes. Sodium at 60 mg/100g makes this yoghurt a low salt food.

- It seems possible that some shoppers might be put off by the redundant detail in the Kellogg NIP and fail to notice the high sodium content of Kellogg Corn Flakes;
- Health professionals can see in the Kellogg NIP that the sodium content of 720 mg/100g is six times too high for a low salt food (≤120 mg/100g).

1. Kellogg Corn Flakes NIP

Nutrition Information (AVERAGE)				
servings per package - 10 average serving size - 30g (1 metric cup†)				
	quantity per serving	% daily intake ▲ per serving	per serve with 1/2 cup skim milk	quantity per 100g
ENERGY	470 kJ	5%	670 kJ	1580 kJ
PROTEIN	2.3 g	5%	7.0 g	7.8 g
FAT, TOTAL	<0.1 g	0.1%	0.2 g	0.2 g
- SATURATED	<0.1 g	0.1%	0.1 g	<0.1 g
CARBOHYDRATE	25.1 g	8%	31.6 g	83.6 g
- SUGARS	2.4 g	3%	8.8 g	7.9 g
DIETARY FIBRE	0.8 g	3%	0.8 g	2.6 g
SODIUM	216 mg	9%	273 mg	720 mg
POTASSIUM	28 mg	-	234 mg	93 mg

2. The mandatory information

	Quantity per serving	Quantity per 100g
Energy	608kJ	405kJ
Protein	4.2g	2.8g
Fat, total	7.4g	4.9g
- saturated	4.5g	3.0g
Carbohydrate, total	18.6g	12.4g
- sugars	18.6g	12.4g
Sodium	90mg	60mg

Another of the Terms of Reference—reduce the regulatory burden

- It would greatly reduce the regulatory burden if we could make one label do the work of two;
- We could put the Nutrition Information Panel (NIP) at the front of the pack and add colours;
- In the mandatory format with traffic lights added the Kellogg NIP data would look like the label on the left if we retained red traffic lights, and like the one on the right if the label showed only green and amber lights (the word HIGH could be removed but this version assumes it might be retained);

**Nutrition Information
(AVERAGE)**
servings per package – 10
average serving size – 30g (1 metric cup)

	per serving	per 100g	TRAFFIC LIGHTS
TOTAL FAT	<0.1 g	0.2 g	LOW
SATURATED FAT	<0.1 g	<0.1 g	LOW
SUGARS (added)	1.2 g	4.0 g	LOW
SALT (as sodium)	216 mg	720 mg	HIGH
carbohydrate	25.1 g	83.6 g	
energy	470 kJ	1580 kJ	
protein	2.3 g	7.8 g	
dietary fibre	0.8 g	2.6 g	
potassium	28 mg	93 mg	

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SATURATED FAT	<0.1 g	<0.1 g	LOW
SUGARS (added)	1.2 g	4.0 g	LOW
SALT (as sodium)	216 mg	720 mg	HIGH
carbohydrate	25.1 g	83.6 g	
energy	470 kJ	1580 kJ	
protein	2.3 g	7.8 g	
dietary fibre	0.8 g	2.6 g	
potassium	28 mg	93 mg	

- A missing colour of course corresponds to an absent red light;
- Food companies would have an incentive to reformulate foods far enough to let them replace absent colours with amber;
- The last label shows the data that Kellogg could use after reformulation to match the sodium content (290 mg/100g) of the home brand corn flakes in two British supermarkets in July 2009 (Sainsbury and Waitrose).

Nutrition Information (AVERAGE)

servings per package – 10
average serving size – 30g (1 metric cup)

	per serving	per 100g	TRAFFIC LIGHTS
TOTAL FAT	<0.1 g	0.2 g	LOW
SATURATED FAT	<0.1 g	<0.1 g	LOW
SUGARS (added)	1.2 g	4.0 g	LOW
SALT (as sodium)	87 mg	290 mg	MEDIUM
carbohydrate	25.1 g	83.6 g	
energy	470 kJ	1580 kJ	
protein	2.3 g	7.8 g	
dietary fibre	0.8 g	2.6 g	
potassium	28 mg	93 mg	

Seven points that really matter

- At least 20% of shoppers would not understand FOP labels that use percentages;
- The disadvantaged need FOP labels they will understand at a glance without any explanation;
- It may be uncertain whether red traffic lights would comply with the Terms of Reference;
- Public health only needs amber and green traffic lights;
- Medical prescribing only needs amber and green traffic lights;
- Progress depends on willing collaboration and lasting goodwill between the government and private sectors;
- Mandatory traffic lights with red lights would damage it very seriously.