

February 2006

AN ASSESSMENT OF THE UPTAKE OF FOOD STANDARDS AGENCY GUIDANCE ON CLEAR FOOD LABELLING

This survey was conducted as part of the Agency's Q02 programme, which aims to underpin and assist implementation of the Agency's objective of promoting informative labelling to help consumers.

Summary

- The Agency issued Guidance on Clear Food Labelling in 2002. The Agency's Strategic Plan contains a commitment to monitor the uptake of this advice. A Stakeholder Meeting was held in July 2004 to aid the Agency in designing a survey to meet this commitment.
- The Agency commissioned Campden & Chorleywood Food Research Association to carry out the survey. 396 products were sampled and assessment forms devised to measure the uptake of the Guidance.
- In general it was concluded that products **had met most recommendations** for best practice. Particularly evident was how closely the guidance was followed on grouping of information (83% of products conformed to the major aspects), on the provision of both nutrition information (89% of products, with 80% of these doing so voluntarily), and on clear and unambiguous date marks (96% of products).
- The recommendations that were not widely followed included that on **font size** (87% of products). A large number of products were also assessed to have given **undue emphasis to features** such as brand information at the expense of essential information as specified by the Agency's advice (71% of products).
- A review of the Guidance might consider updated, **streamlined, simplified and targeted** guidance, in the form of a single self-contained text more clearly restricted to the information that is either required on pack by law or which, having been volunteered, must be provided in accordance with the law.

- Such revised Guidance could also usefully distinguish more clearly between approaches that are **recommended**, practices that should be **avoided**, and labelling that is detrimental to label **clarity**. The full report describes how this could be achieved.

Background

1. The Food Standards Agency's stated aims for 2001-2006¹ included a series of initiatives to promote best practice within the food industry. In pursuit of this and as a response to research showing that many consumers found labels hard to use², in early 2001 the Food Standards Agency established a Clear Labelling Task Force comprising individuals with a wide range of expertise, experience and interest, to advise on what might be done to improve the clarity of food labels.
2. It made recommendations to tackle each of these, drawing on existing guidelines, particularly those published by the Institute of Grocery Distribution on font size and clarity³. The Task Force also recognised that products come in all shapes and sizes and that their labels could not be expected to conform to a single ideal format. Its approach, therefore, was to develop a format which could be used on most products, supplemented by alternatives that were recommended where size and/or shape preclude the use of the ideal.
3. In October 2002, the Food Standards Agency published Guidance on Clear Food Labelling, with the purpose of encouraging brand holders to follow best practice so that consumers could more readily find, read and understand key labelling information.
4. The Agency's Strategic Plan 2005-2010 undertakes to review this Guidance.
5. Although the existence of this guidance has been widely publicised and made generally available through the Food Standards Agency's website, the extent to which its provisions have been followed had not previously been measured. In July 2004 the Agency held a Stakeholder Meeting to assist with the planning of the survey.

Methodology

6. During January and February 2005, 396 food products were purchased from over 60 major supermarkets and leading convenience stores located throughout the UK. All product types and packaging formats were represented in a broadly equal mix of branded products and those that were marketed under a retailer's own name.
7. The samples were photographed, often from several angles, and whenever practicable a scan of the label was made. Experienced food law advisers with specialist food labelling skills individually assessed the label of each product. By examining up to 70 separate features of the product and its label, they determined the extent to which the Food Standards Agency's Guidance had been followed. Their conclusions were recorded electronically and assembled into a spreadsheet that was used to analyse the overall findings and to determine any patterns or trends. Individual product assessments were also sent to the relevant brand holders, giving them an opportunity to comment on the findings.

Results

8. In general products **had met most recommendations** for best practice. The most notable exception was the recommendation on minimum **font size** where 87% of the sample did not follow the advice for what is termed 'essential information' in the guidance. This is the information that consumers would need to make informed purchase decisions and use food safely and includes: name of the food, net weight or volume (where required), list of ingredients, date mark (or a reference to where it can be found), nutrition information, instructions for use and/or storage and customer care line information (or other information about how to contact the manufacturer, packer or seller).
9. The widespread use of **typefaces** that were **smaller** than the recommended minimum for other information, did have the potential to affect clarity for certain groups of consumers. Although the size or shape of a limited number of packs made it difficult to support the recommended minimum typeface size, most of these did not appear to have acted upon the recommendation to address a number of factors, set out in the guidance, that might have made it easier to meet the advice.

10. Having assessed the products against the Food Standard Agency's Guidance, the assessors considered that many had given **undue emphasis** to information on branding, claims, pictures and the like, and to have done so at the expense of the essential information specified in the Guidance. In a majority of these cases, it would seem to have been possible to avoid doing so.

In the view of the Assessors:

- 51% of the samples could have reduced the space given to other information, including branding, claims and pictures;
- 15% could have improved the style, type or size of label chosen;
- 9% could have improved the clarity of essential information by improving the label layout.

11. As part of the survey the percentage of the printable area used to provide the ingredients list, the nutrition panel, and allergen warnings in English was measured. On average 8.1% of the printable area on pack was allocated.

12. Some of the guidance recommendations relating to **layout and presentation** of information had not been met but in many cases this was **not found to affect the clarity** of the label.

13. Most of the labels assessed ensured that information about the product was **easily visible** (e.g. not hard to find or locate, due to the way that information was laid out) **and clearly legible** (e.g. not smudged or fuzzy). In a small number of cases, however, lack of visibility or legibility arose, normally as a result of printing or layout inadequacies.

14. In the majority of cases key information required by law and which the consumer requires to make informed purchasing decisions and use food safely was **grouped together** in accordance with the guidance. However the Guidance also recommends the use of defined borders, signposting between groups of information and that any customer care line is located with one of the information groupings. The Guidance on these issues was less well followed. Multiple signposts were not common, but sometimes required consumers to look in several places on the label to locate the essential information.

15. Most products provided full (i.e. Group II) **nutrition labelling**, irrespective of whether or not a nutrition claim about a product is being made. A majority of products also highlighted fat and calories per serving and provided per serving indications. The provision and explanation of recommended Guideline Daily Amounts for fat saturates and calories was less common.
16. **Date marking** was almost always clear and unambiguous. Where required to be indicated, it normally distinguished days from months and months from years, so that consumers would not be confused about the end of the product's shelf life.
17. At the time of the survey food manufacturers and retailers were already introducing the full declaration of an agreed list of **allergens** in advance of mandatory requirements that came fully into effect in November 2005. Indeed, the great majority of these allergens already appeared to be declared explicitly and normally in simple language. A significant number of products also carried additional voluntary allergy advice, normally in the form of "contains" boxes. As recommended, when used these were usually placed next to the ingredients list although, none specifically referred consumers to those lists for more detailed information, as is also recommended.
18. It was clear that the **style of font** could adversely affect clarity - the use of **watermarking** and **indistinct numerals** could impair clarity. Although **the combination of red and green** for typefaces was rare, it may be difficult for colour blind consumers to discern.
19. **Emboldened** text was not prone to affect clarity and it was used normally as recommended for emphasis. Although not recommended for emphasis, the few products that used **underlining** for this purpose did not appear unclear. The use of **uppercase letters** for this same purpose was very widespread, but again in most cases did not impair the label's clarity. **Italics, pastel colours, range left formats, hyphenation and justified text** which are also recommended against, were widely used, although usually without any effect on the label's clarity.

20. **Metallic or high shine surfaces**, which are often used for technical reasons, such as to avoid scuffing, were found to be widely used, and often without any adverse affect on the clarity of the label.
21. The use of **icons** to indicate information relating to packaging recovery and recycling, suitability for particular diets and cooking and storage instructions, was commonplace and those icons that were used for such purposes were normally easily recognisable.
22. It was most common for a food's **legal name** to be included on the front of the pack, whether or not it was repeated on other surfaces.
23. The vast majority of products were labelled only in English. A few highly **multi-lingual** products were encountered (up to 16 on one product, and 20 products carried information in more than 2 languages), and in these cases there was likely to be a detrimental effect on labelling clarity. Most non-English labelling was in other European languages.

Legal issues

24. The law requires that all labelling, whether for prepacked or non-prepacked food, must be easy to understand, clearly legible, indelible, easily visible and not misleading to the consumer. The Food Labelling Regulations are supported by a range of non-statutory Agency guidance, including that on clear labelling. The guidelines have no statutory force but where companies or individuals are prosecuted, courts can take the guidelines into account when interpreting the law. Only the courts can decide whether, in particular circumstances, an offence has been committed.

Conclusions

25. The full report with results and discussion included is available on the Agency website at www.food.gov.uk.
26. Overall the survey demonstrated that food labelling in the UK met the majority of best practice recommendations set out in the Food Standards Agency's Guidance. Of major significance are the standardisation of grouping of 'essential information' and the

widespread voluntary provision of nutritional labelling. However there were notable exceptions, the most notable of which was the widespread use of smaller font sizes than recommended. The proxy measure of the percentage printable area used for ingredient listing, allergen labelling, and nutrition labelling (average 8.1%) supported the assessors' finding that in many cases font size of 'essential information' could be improved with a reduction in space for branding, promotional, and/or pictorial information

27. The report recommends a review of the Guidance might consider updating, streamlining, simplifying and targeting the Guidance, in the form of a single self-contained text more clearly restricted to the information that is either required on pack by law or which, having been volunteered, must be provided in accordance with the law.
28. It also recommends that such Guidance might also distinguish more clearly between approaches that are recommended, practices that should be avoided and techniques that, if not executed carefully, can be detrimental to label clarity. The full report describes how this could be achieved.
29. The Agency will consider the report as part of its review of the guidelines. Any changes to the guidelines will be subject to a full public consultation in Summer 2006.

References

1. Foods Standard Agency Strategic Plan 2001-2006. Putting Consumers First, 2001.
2. Food Standards Agency Board Meeting, 21 September 2000. Paper Food Standards Agency 00/04/07.
3. Institute of Grocery Distribution Packaging Legibility, Recommendations for Improvement.

Further Information

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