



The Royal Australasian
College of Physicians

Mandatory Front-of-Pack “Traffic Light Labelling” on Food and Beverages A Policy Position Statement by the Royal Australasian College of Physicians

Executive Summary

There is substantial evidence that Nutritional Information Panels (NIPs) are not widely effective in conveying to consumers the healthiness of the food and drink products they purchase. Consequently, consumers are not being sufficiently helped to make healthier food choices. The addition of colour-coded nutrient content information on the front-of-packs, known as “Traffic Lights”, aiming ‘to guide the traffic’ towards healthier choices, have been shown to increase accessibility to nutritional information for a wide range of consumers, and assist them in making healthier food choices. Making Traffic Light information mandatory on the front-of-pack of food and beverages in Australia and New Zealand, to support the information already provided on the NIP on the back and sides of food packaging, would therefore be a positive step in the multi-faceted approach required to reduce the burden of obesity, as well as combating dangerous levels of salt consumption.

Following the recommendations of this paper would make Australia and New Zealand the first countries to adopt Traffic Light labelling mandatorily, demonstrating our commitment to public health promotion and prevention, and providing the template for other nations to follow.

Recommendations

The Royal Australasian College of Physicians (RACP) recommends:

That Federal regulations be put in place in Australia and New Zealand to provide for mandatory “Traffic Light” labelling on the front-of-packaging of food and beverages sold in these countries;

We further stipulate that:

- **This is to be applied to all food and beverages which are currently subject to nutritional labelling regulations;**
- **Information should be mandatorily provided for the nutrients - saturated fat, sugar, total fat and sodium;**
- **This should include information on grams / ml of nutrients per serving (in conjunction with the regulation of serving sizes for products)**
- **There should be one consistent system for Traffic Light labelling, based on universally applied standards, as set by Food Standards Australia New Zealand (FSANZ), including continuity in the order of nutrients displayed on labels;**
- **Provision should be made for the industry to provide further information at another source (e.g. NIPs, website), subject to regulations;**
- **The introduction of Traffic Lights should be supported by an extensive public education campaign;**
- **Nutritional Information Panels (NIP) will continue to be mandatory on back-of-pack;**
- **Absolute guideline daily amount of nutrients should be added to NIPs.**

Next Steps:

As an extension to the implementation of Traffic Light labelling as described above, the College would also like to see the following:

- **Online Traffic Light information for internet shopping;**
- **The inclusion of Traffic Light information in cafes and restaurants (as an extension of the US and UK calorie information programs);**
- **Removal of health and nutrient claims on foods (e.g. 20% less fat);**
- **Inclusion of '2 and 5 a day' status on food and beverages sold.**

The Case for Traffic Light Nutritional Labelling

Consumer dissatisfaction with Nutritional Information Panels (NIPs) is well documented [1], as are the difficulties many consumers have comprehending the information these provide [2-7]. This indicates that nutrition information in its current form confuses and

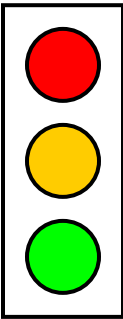
potentially misleads consumers, and therefore reduces opportunity for basic healthy choices. Consumers have indicated that changes could be made to labelling to enhance their understanding of nutrition information, particularly noting greater use of colour, greater consistency across products, highlighting of the most important areas of information, and assistance to put the product's nutritional value into the context of the overall diet [1]. Traffic Light labelling, as recommended in this paper, addresses all these areas.

After considerable consumer research espousing its effectiveness [1], Traffic Light labelling was adopted in the UK on a voluntary basis (due to EU restrictions), but subject to guidance from the UK Food Standards Agency (FSA). This has been positively received by consumers and widely adopted throughout the industry leading to pressure for its mandatory implementation through the European Commission.

What does a Traffic Light label show?

Traffic Light labelling uses red, amber and green to indicate whether the levels of specified nutrients in a product are low, moderate or high, in respect to healthy daily intake levels of that nutrient. Nutrients highlighted for Traffic Light labels, are those which must be restricted or minimised in a healthy diet, i.e. fat, saturated fat, sugars and sodium, allowing consumers to see at-a-glance a product's compliance with NHRMC dietary guidelines.

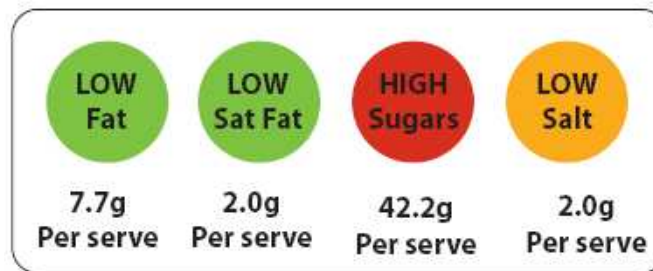
We recommend the following definitions for Traffic Light colours, based on FSA guidelines:

	<p>Red = High. The food is high in something we should be trying to cut down on. It's fine to have the food occasionally, or as a treat, but try to keep an eye on how often you choose these foods, or try eating them in smaller amounts</p> <p>Amber = Moderate. The food isn't high or low in the nutrient, so this is an OK choice most of the time, but you might want to go for green for that nutrient some of the time</p> <p>Green = Low. The food is low in that nutrient. The more green lights, the healthier the choice.</p>
-------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

We recommend the Traffic Light colours are supported by the actual amount of grams / ml of that nutrient per serving of the product, to allow consumers to further consider the

impact of the product on recommended daily intake guidelines for that nutrient. This has also proved very popular with consumers [8]. Additionally, to maximize comparability for consumers, we also recommend that the nutrients on Traffic Light labels are consistently in the same order, so people know straight away where to look for a particular nutrient.

The following is an example of a Traffic Light label which meets most requirements - the size of a serving should also be clearly displayed:



Source: Faculty of Public Health UK

URL: http://www.fphm.org.uk/resources/AtoZ/ps_food_labelling.pdf

Traffic Light labelling on front-of-packaging provides clear, concise, at-a-glance, information on a product's nutrient content, as well as information on what consumption means within a balanced diet. Evidence has shown indisputably that front-of-pack Traffic Light labelling is an effective method of assisting consumers to identify healthier products [9], including when compared to other front-of-pack labelling systems [9], and particularly when considering it is estimated that consumers only spend between 4 and 10 seconds choosing each product.

Evidence shows that Traffic Light labelling:

- Provides quick and simple information to consumers [9];
- Assist consumers to more accurately assess nutrient levels and identify healthier products [6, 9];
- Allows consumers to identify which is the healthier product over all, rather than just focussing on a single nutrient [9];
- Allows at-a-glance decisions on a products relative health value – an important factor in today's increasingly busy lifestyles [9];
- Assists consumers in viewing individual products in the context of a balanced diet;

- Provides positive outcomes across a range of ethnically diverse and socio-economic groups, as well as increasing accessibility for poor readers, non-English speakers, and those with poor eyesight [7, 9];
- Is popular with consumers [1, 9, 10];
- Aids consumer comparison of different products [9];
- Is more effective in conveying information than other front-of-pack labelling options [9];
- Encourages consumers to look at the nutrients that they use to make their healthiness judgements, and therefore helps educate the consumer in relation to the important nutrients to factor when judging the healthiness of foodstuffs [6].

In Australia and New Zealand advocates for the adoption of Traffic Light front-of-pack nutritional information include the Health Select Committee Inquiry into Obesity and Type 2 Diabetes in New Zealand [11], and both the West Australian and South Australian Health Ministers.

A more inclusive approach

Research also indicates that consumers from ethnic minorities and lower income groups are even less likely to use NIPs than other groups, citing reasons such as a lack of interest in healthy eating and a lack of understanding of what the information means [7]. A survey of ethnically diverse shoppers in New Zealand, despite being designed to be simple, found that only two-thirds were able to identify the requested nutritional information [7]. *“As such, nutrition labels appear to be failing to meet the needs of those who need them most and are likely to be contributing to increasing health inequalities.”* [2]

Australian and New Zealand research has also shown Traffic Light labelling is not only preferred over NIPs by consumers across a range of ethnic and income groups, but is also more likely to be understood. Traffic Light labelling addresses the ethnic and income disparities in the ability to use NIPs to determine the healthiness of products [7]. *“Traffic-light labels performed best in classifying whether a food was healthy or not across all ethnic groups and income levels, thereby making the information available to all members of the community”* [7]. This consolidates results of UK based research on Traffic Light labelling [12] [9].

Additionally, the greater reliance on colour over words and figures in nutritional labelling will increase accessibility to numerous groups, such as those with poor vision, poor readers, and non-English speakers.

A consistent, regulated, national system

Evidence shows that consumers prefer a simple, universal system [10] for nutritional labelling, consistent across all shops and brands, with standards set and regulated by a trusted source [4, 9]. In the UK, the core principles of the Traffic Light system are developed by the FSA. However, the voluntary nature of the UK system means that different shops and brands have developed different labelling systems leading to inconsistency in labels, particularly given some products avoid it altogether [2]. In the UK, which nutrients are displayed, and serving sizes for example, vary from brand to brand, significantly reducing comparability between products, and increasing consumer confusion [13]. For the public to have trust in this new system and be motivated to engage with it, it must be well-evidenced, transparent, consistent, and administered by a trusted authority, with appropriate independence and expertise. Food Standards Australia New Zealand (FSANZ) would be the obvious choice for setting the standards for this program, as an extension from their current nutritional labelling requirements [14].

The RACP advocates that FSANZ be the body responsible for standard setting and regulation of Traffic Light labelling.

FSANZ responsibilities would include:

- setting the nutritional standards, i.e. defining the boundaries for red, amber or green ratings for each nutrient;
- developing different standards for adults and children, ensuring they are applied to correct products [13], and providing information to assist the industry in its application;
- regulating the format and size of the label;
- prescribing the serving sizes for different product types (e.g. 30g for breakfast cereals) [13];

- providing education to consumers on what the traffic lights system means (such as the education program behind the 'Pick the Tick' program) [15], and generally on nutritional information [4, 10];
- regulating any additional information that food manufacturers may choose to provide relating to the nutrient value of products.

Percentage Dietary Intake (%DI)

The current provision for voluntary inclusion of %DI information on labels, initiated in 2006, has been suggested as an alternative to Traffic Lights. %DI shows the level of each nutrient in a 'serving' of a product as a percentage of an 'average persons' recommended daily amount (or daily limit) for healthy intake.

There is evidence that %DI labels assist consumers in planning a balanced diet, but this is counterbalanced by evidence that consumers find the data too complex [16], and many feel it involves too much calculation - which they are either not interested in doing, or unable to do [4, 16]. Research indicates that the inclusion of %DI on labels does not necessarily increase consumer understanding of health values of products over the mandatory NIP labelling [7, 16].

Along with the lack of consistency and comparability between products which comes from the voluntary status of %DI labelling, the main problem is that the nature of %DI implies that there is a goal of 100% to achieve for a given nutrient, whereas actually more often the goal is to limit intake [13]. The %DI system does not distinguish or clarify the difference between acceptable and aspirational amounts of a nutrient, as varies based on the nutrient, e.g. with saturated fat, which is to be minimised in a diet, the %DI is not a goal but an absolute limit, whereas with kilojoules, 100% %DI is an optimal amount to be reached.

Health and Nutrition Claims

Communicating nutritional information to consumers is further hindered by the presence of health or nutrition claims on products. Studies show that consumers are most influenced by the clearest, simplest claims on products, and consequently where a product is marked as being 'low fat' or 'light', it is seen as intrinsically healthy and consumers may forgo the

need for further nutritional analysis [4]. This is therefore misleading. Claims such as '99% fat free', or '20% less fat' also cause confusion, as people do not know how many grams of fat a product may contain when making such claims, and therefore do not know what this information means [5, 17].

Impact on Industry

The College acknowledges the Australian Food and Grocery Council's (AFGC) opposition to mandatory Traffic Light labelling, or any deviation from the current arrangements. However, there is significant evidence, from Australian, New Zealand and international research, that front-of-pack Traffic Light labelling assists consumers across the socio-economic and ethnic spectrum in making healthier purchases. Traffic Light labelling is much better understood than the current NIP information, which AFGC continues to advocate, but which they also initially opposed.

The College acknowledges industry concerns that consumers may interpret 'red' lights as meaning that the product should not be consumed, rather than a warning that they should be consumed in moderation [8], which will potentially adversely effect product sales. Within the bounds of regulations set by FSANZ, industry should be allowed to provide additional information on their products content on their website or as part of packaging, which they may use to provide further information for consumers (e.g. see Kelloggs). Comprehensive information on the definitions of Traffic Light colours will also form part of the information and education campaign accompanying the introduction of Traffic Light labelling.

Alternatively, the industry might wish to take this opportunity to make a concerted effort to minimise their product's content of the defined nutrients in order for their product to have a more positive health impact. This has been the outcome of previous nutrition campaigns, such as the 'Pick the Tick' campaign which resulted in a large reduction of added salt in bread, cereal and margarine products [18], and has already been an outcome of Traffic Light labelling in the UK [19]. It is anticipated that an appropriate lead-time before the mandatory implementation of Traffic Light labelling be negotiated with the food and

beverage industry to allow time for product development to occur with the aim of minimising any risks to the food industry.

1. Shine, A., S. O'Reilly, and O.S. Kathleen, *Consumer use of nutrition labels*. British Food Journal, 1997. **99**(8): p. 290-296.
2. Ni Mhurchu, C. and D. Gorton, *Nutrition labels and claims in New Zealand and Australia: a review of use and understanding*. Australian and New Zealand Journal of Public Health, 2007. **31**(2): p. 105-112.
3. Rayner, M., A. Boaz, and C. Higginson, *Consumer Use of Health-Related Endorsements on Food Labels in the United Kingdom and Australia*. Journal of Nutrition Education, 2001. **33**(1): p. 24-30.
4. European Food Information Council (EUFIC) (2005) *Consumer attitudes to nutrition information & food labelling*.
5. FSANZ and NFO Donovan Research, *Food Labelling Issues: Quantitative Research with Consumers to Food Standards Australia New Zealand ; prepared by NFO Marketing and Communications Research Consultants ; Donna Paterson [et al]*, FSANZ, Editor. 2003, FSANZ: Canberra.
6. Jones, G. and M. Richardson, *An objective examination of consumer perception of nutrition information based on healthiness ratings and eye movements*. Public Health Nutrition, 2007. **10**(03): p. 238-244.
7. Gorton, D., et al., *Nutrition labels: a survey of use, understanding and preferences among ethnically diverse shoppers in New Zealand*. Public Health Nutrition, 2008.
8. European Food Information Council (EUFIC), *Pan-European consumer research on in-store observation, understanding & use of nutrition information on food labels, combined with assessing nutrition knowledge*, in *EUFIC Forum*. 2008.
9. Kelly, B., et al., *Front-of-Pack Food Labelling: Traffic Light Labelling Gets the Green Light*, Cancer Council, Editor. 2008: Sydney.
10. Harper, G. and S. Henson, *Consumer Concerns about Animal Welfare and the Impact on Food Choice*, in *EU FAIR CT98-3678*. 2001, University of Reading: Reading, UK.
11. Health Committee, *Inquiry into Obesity and Type 2 Diabetes in New Zealand*, H. Committee, Editor. 2007: Wellington.
12. Which? (2006) *Healthy Signs? Campaign Report*.
13. Lobstein, T., J. Landon, and P. Lincoln, *Misconceptions and misinformation: The problems with Guideline Daily Amounts (GDAs)*. 2007, National Heart Forum: London.
14. FSANZ, *Australia New Zealand Food Standards Code*, C.o. Australia, Editor. 2008, Anstat Pty Ltd: Canberra.
15. Heart Foundation. *Heart Foundation Tick Programme - TV & Radio*. Heart Foundation Tick Programme [cited 2009 25 Feb 09].
16. Boum, D., et al., *Consumer Understanding of Percentage Daily Intake (%DI) Information*. 2006, FSANZ: Canberra / Wellington.
17. MORI, *Consumer Attitudes to Food Standards Wave 5*, F.S. Agency, Editor. 2005, Food Standards Agency London.
18. Young, L. and B. Swinburn, *Impact of the Pick the Tick food information programme on the salt content of food in New Zealand*. Health Promot. Int., 2002. **17**(1): p. 13-19.
19. Faculty of Public Health, *Traffic Light Food Labelling*. 2008, Faculty of Public Health: London.