



## **Response on behalf of the European Heart Network to:**

### **Labelling: Competitiveness, Consumer Information and Better Regulation for the EU - A DG SANCO Consultative Document**

June 2006

#### **Introduction**

The European Heart Network (EHN) is a Brussels-based alliance of heart foundations and others concerned non-governmental organisations throughout Europe. EHN has 31 member organisations in 26 countries.

The mission of the EHN is to play a leading role through networking, collaboration and advocacy in the prevention and reduction of cardiovascular diseases so that they will no longer be a major cause of premature death and disability throughout Europe.

Cardiovascular disease, (CVD) is the main cause of death in the EU killing over 1.9 million people each year. There is a wealth of established evidence on the relationship between diet and CVD. It is estimated that up to a third of premature deaths from CVD in the EU stem from unhealthy diets. The causes of unhealthy eating are complex but one of the causes is the lack of readily accessible, comprehensible and comparable nutrient content information for foods.

In 2003, EHN published a report of a systematic review of the literature on consumer understanding of nutrition labelling (<http://www.ehnheart.org/content/ItemPublication.asp?docid=4517&level0=1455&level1=1499>). The findings of this review largely informs the answers to the below questions.

In general terms, this study found that consumers do not understand some of the technical terms used on the current labels. Nor do they understand which nutrients are most important to look at, what counts as a lot or a little of a nutrient in a product, whether small differences in nutrient levels between products are important and, how to trade off high levels of one nutrient against low levels of another nutrient.

EHN's comments will be limited to the section on *Nutrition Labelling*.

## 1 Should nutrition labelling be mandatory?

EHN believes that nutrition labelling should be mandatory with rare exceptions (e.g. very small packets) to ensure that nutrition labelling is comprehensive (found on as many foods as possible). EHN also believes that it is important that nutrition labelling should be in a format which is both standard (in order to ensure that consumers can readily make comparisons between foods) and comprehensible (in order to allow consumers to judge whether there is a lot or a little of certain nutrients in foods).

If nutrition labelling were comprehensive, comparable (standardised) and easier to understand, consumers could use that information to eat more healthily.

## 2 How much information is required?

EHN considers that there are six key nutrients relevant to public health. These are: energy, saturated fat/trans fats and sodium, but also total fat, added sugars (more precisely non-milk extrinsic sugars) and dietary fibre. EHN recommends that information about these six nutrients should be mandatory.

It is important that people should avoid foods high in saturated fat, trans fats and sodium in order to reduce their risk of CVD. In addition they need to regulate their intake and expenditure of energy (and their intake of fat and added sugars) in order to avoid overweight and obesity – fast becoming one of the most important public health problems in Europe.

In a policy document published in 2002 *Food, nutrition and cardiovascular disease prevention in the European region*<sup>1</sup> EHN proposes five priority population goals in relation to diet and physical activity: a reduction in saturated fat and trans fats, a reduction in salt intake, a reduction in average body mass index, an increase in physical activity and an increase in fruit and vegetable intake. Better information about the energy, saturated fat, trans fats and sodium content of foods would help in attaining three of those goals.

Nutrition labelling – in its current format – does not give information about trans fat and added sugars, and frequently does not give information about saturated fat and sodium. Information about these nutrients on food packets would be more useful from a public health perspective than information about the content of other nutrients, e.g. protein which is currently a minimum requirement for nutrition labelling.

EHN suggests that the nutrition label should not give too much information – otherwise consumers will not realise which nutrients information they should concentrate on when choosing foods on nutritional grounds. EHN does not think it should be mandatory to provide information about nutrients other than the six listed above. Other information can be provided on a voluntarily basis.

By recommending that information about key nutrients should be provided on a mandatory basis and that information about other nutrients can be provided voluntarily EHN is not

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<sup>1</sup> EHN (2002) *Food, nutrition and cardiovascular disease prevention in the European region: challenges for the new millennium*. EHN: Brussels

suggesting that nutrition labelling should be 2-tier, as at present. EHN recommends that the mandatory information about key nutrients should be clearly separated from voluntary information about nutrient content so that consumers are directed towards the most important information in relation to public health.

### **3 Are there alternative formats for providing nutrition information?**

EHN is currently finalising a report reviewing front-of-pack nutrition schemes. Although the more detailed recommendations remain to be formulated, EHN and its members have already agreed to recommend that a front-of-pack nutrition scheme should be mandatory and developed as part of the review of the current Nutrition Labelling Directive. The front-of-pack scheme should be in addition to a mandatory full nutrition labelling (back-of-pack) and should:

- apply to the vast majority of packaged foods including packaged foods in catering outlets
- provide information about those nutrients about which there is most public health concern (i.e. energy, fat, saturated fat, added sugars and sodium)
- provide information in a format which has been demonstrated to be helpful to consumers.

### **4 Where should the nutrition label be put?**

EHN considers that it is necessary to distinguish between back-of-pack nutrition labelling and front-of-pack nutrition schemes. EHN considers that both should be mandatory and have standardised formats. The back-of-pack nutrition labelling should be able to give more and more detailed information whilst the front-of-pack information should be simpler and easier to use.

### **5 How important is presentation of the information?**

In this section EHN only makes recommendations about the back-of-pack nutrition labelling

- format to be utilised (e.g. linear, tabular, graphical presentation...)

EHN notes that all of the available research on consumer understanding of nutrition labelling points to a need to a revision of the current format currently prescribed by the Directive. EHN's review has examined the literature investigating alternative formats. This literature demonstrates clearly that various formats are more comprehensible than the one prescribed by the Nutrition Labelling Directive.

When testing different formats for nutrition labelling all researchers have assumed that a tabular format is more comprehensible than a free text format. Nonetheless, EHN notes the increasing use of free text formats, which EHN considers should be prohibited in a revised Directive.

- order of nutrients and/or highlighting of certain nutrients

EHN considers that the nutrients which are most relevant to public health should be listed first on the label. This means that EHN's preferred order would be energy, fat, saturated fat/ trans fats, sugar, fibre and sodium.

- legibility, font size etc...

There is a considerable number of studies to show that both font size and legibility of current nutrition labelling is serious problem for many consumers – particularly the elderly with failing eye sight. EHN recommends that any revised Directive should specify minimum font sizes and that all labelling should be presented in black on white.

- expression of nutritional content

EHN considers that nutrient content levels should preferably be given as a percentage of a recommend daily value. Doing so would also help consumers to see how much of a nutrient they were getting from consuming the product relative to a recommended amount and this could be useful to them. We recommend that EFSA, as a matter of urgency, should develop recommended daily values for food labelling purposes.