



Lie of the label II

Why dishonest labelling is past its sell-by date

The 'seven deadly sins' of dishonest food labelling were first identified by the Co-op in 1997. These were tricks of the trade used to make products appear bigger, better value or more wholesome than in fact they were. Five years on, progress to eliminate them has been slow. Now, with urgent warnings by health experts that our appetite for fat, sugar and salt is becoming a health hazard, the time has come to sweep dishonest labels off the shelf once and for all.



Summary

[<<back to top>>](#)

In 1997, the Co-op, working with the Consumers' Association and Sustain- the alliance for better food and farming- began a crusade to persuade the food industry to follow the spirit, and not just the letter, of the law when it came to the labelling of food and drink.

Our report - 'The Lie of the Label' - identified the 'seven deadly sins' of dishonest labelling. We exposed practices by food producers and retailers that misled consumers into thinking the food they were buying was better than it actually was.

We put forward a code of practice for honest labelling, which we committed to follow ourselves, submitted as a model for regulators and called - in vain - on others in the industry to adopt.

Now in 2002, working with Sustain, we have revisited food labelling, on behalf of consumers, to see how things have improved.

In the five years since 1997, there has been a flurry of initiatives, including the introduction of a variety of guidelines on labelling and the setting up of the Food Standards Agency (FSA) as an independent watchdog. But the seven deadly sins are alive and well.

Particularly alarming is the lack of progress on nutrition labelling. There has been a series of warnings* ([See Endnote 1](#)) by food and health experts that our diet is contributing to a growth in obesity and other health problems in the UK, including among children.** ([See Endnote 2](#))

Food labelling cannot wholly be blamed for diet-related disorders, but the Co-op believes that the absence of clear, concise and consumer-friendly nutrition information by food producers is a contributory factor - and one that can be easily eliminated.

We think the time has come to take further action and the public agrees, as independent research carried out by NOP shows.

The Co-op has already challenged regulations which we believe have not been drawn up in the consumers' best interests. Now we will defy them again in order to field-test a radical new approach to nutrition labelling, which will hand back to consumers their right to know whether or not the food they buy in the supermarket is good for them and their families.

Contents

[Five years on: what has changed since 'The Lie of the Label'?](#)

[Warning: eating can damage your health](#)

[Fibs about fat](#)

[Sugar shams](#)

[Secrecy on salt](#)

[Health claims that make you sick](#)

[New-look nutrition panels](#)

[Co-op action plan](#)

[Responsible retailing and the Co-op](#)

[Glossary of terms](#)

[Endnotes](#)

Five years on: What has changed since 'The Lie of the Label'?

A food label is a message from the seller of a product to the buyer of the product. It's a kind of promise that what the buyer sees is what the buyer will get. Buyers expect sellers to keep their promises. But all too often they are betrayed.

Five years ago, in 1997, the Co-op produced a report called 'The Lie of the Label'. We identified the food industry's tricks of the trade, where, wittingly or unwittingly, the label deceived consumers into thinking they were getting something better. There were many techniques, but we analysed them under seven headings, called the '[seven deadly sins](#)' of dishonest labelling.

Not surprisingly, 'The Lie of the Label' caused a stir in the industry. Having lifted the lid on the tricks of the trade, we then challenged them to follow our lead and adopt the labelling policies and procedures set out in the Co-op code of practice, including the creation of a Consumer Jury to adjudicate on complaints about labelling.

New laws since 1997

Since 1997 there has been a lot of talk, but limited action, by companies to improve labelling practice, perhaps because there have been only three significant legal changes:

- QUID*[\(See Endnote 3\)](#): (Quantitative Ingredient Declaration): companies have been obliged to declare the percentage contribution of principal ingredients (since 14/2/00).
- GM**[\(See Endnote 4\)](#): companies have been obliged to state if the product contains genetically modified soya or maize (since 19/3/99), extended to ingredients, additives and flavourings (since 10/4/00).
- BSE†[\(See Endnote 5\)](#): for beef and beef products, companies must state the countries in which the animal was slaughtered and cut (since 1/9/00), also born and reared (since 1/1/02), giving identification codes to specify origin.

As for other labelling issues, the Food Standards Agency and its predecessors have produced guidelines and codes of practice†† [\(See Endnote 6/7/8/9\)](#). - and it continues to do so. But these are difficult to enforce and so can easily be ignored by companies when it suits them.

Nutrition labelling

If nutrition information is included, a legally-required format has been in place since 1990, with two options:

- The Big Four - energy, protein, carbohydrate and fat.
- The Full Eight - the Big Four above, plus the Little Four: sugars, saturates, fibre and sodium.

The regulations state that either the Big Four will be given, in the stated order, or the Full Eight will be given, in full.

But there is no requirement for the company to put this information on pack, unless it is making a nutrition claim.

It is not surprising, then, that producers of fatty, sugary and/or salty foods often choose not to list nutrition on pack. Even when they do, our research shows that consumers cannot always easily understand it. Current labelling formats are of little help and consumers are baffled by the relationship between sodium and salt, and the relationship between carbohydrate and sugar.

The 'seven deadly sins'

<p>The Illusion: labels which hide information from you, because you wouldn't buy the product if you were in the know. For example – products called 'mince' and 'onion', where the main ingredient was mechanically recovered chicken.</p> <p>Weasel Words: labels which hook you in with a word that doesn't mean much, but sounds good. For example, 'traditional', 'natural', 'wholesome'. Or the use of terms like 'Haddock Steaks' to describe a product cut from a big block of compressed fish.</p> <p>Rose-tinted Spectacles: this is where what's pictured on the pack looks a lot better than what's on the inside. This can be achieved by clever photography and/or by using small-sized plates to make the portion look bigger.</p>	<p>The Bluff: labels that make it sound really special that something's been left out or put in, when actually it's quite normal. For instance, dried pasta that is 'free from preservatives', when it is not allowed to contain preservatives by law.</p> <p>The Hidden Truth: labels where crucial information is hidden away where it can't be seen. For instance, the minimum percentage meat content.</p> <p>The Half Truth: labels that tell you what isn't in the product, instead of what is. For example, if crisps were 80 per cent fat free, that means they were 20 per cent fat way over the permitted claim for a low-fat product (total fat content must not exceed three per cent).</p> <p>The Small Print: labels where you need a magnifying glass to read all but the 'hard sell' on the front. For example, labels where the ingredients are printed in small type in colours that don't contrast with the background.</p>
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Pan - industry agreements

Pan - industry standards are more generally adhered to, but, on the whole, these do not go far enough. An example of this is the 1998 fish code of practice* ([See Endnote 10](#)), which still fails to outlaw the use of 'fillet' and 'steak' for products made from fish blocks.

EU regulations

EU regulations have the weight of law, in that defiance of a regulation can be drawn to the attention of the watchdog responsible for policing it. But EU regulations have a long development period and inevitably are watered down by pressure from industry lobby groups.

For example, EU regulations** ([See Endnote 11](#)) are finally being drawn up that will make full ingredient listing compulsory. But as drafted, they do not address ingredient information in some instances, e.g. in alcoholic drinks, which research shows would be welcomed by consumers. The Co-op is in defiance of the law by labelling the ingredients of alcoholic drinks and by using the words HIGH, MEDIUM and LOW to make sense of complex nutrition labelling on food. Both are welcomed by consumers.

We will continue to challenge regulations that we think are not sufficiently in the consumers' interest. For example, we are phasing in calories on wine labels with effect from July 2002.

Research By Sustain

We believe the lack of a proper regulatory framework for honest labelling means companies are abusing consumer trust and getting away with it. And we have been proved right, as research by Sustain shows.

In May 2002, the Co-op asked Sustain to review the current state of labelling practice in both branded and own - brand products.

Sustain surveyed labels on everyday food products on sale in high street supermarkets, looking for the presence or absence of specific information and for example of misleading practice. Sustain plans to submit a copy of its report to the Food Standards Agency's Food Labelling and Standards Division.

The Consumers' Association† ([See Endnote 12](#)) and the Food Standards Agency†† ([See Endnote 13](#)) have published reports this year on labelling, indicating a desire by consumers and regulators for companies to clean up their act.

Urgent Action

In this report, we focus on the two areas requiring the most urgent action:

- Better nutrition information on all foods, especially those that contribute disproportionately to the amount of fat, sugar and/or salt in our diet.
- Clearer, more understandable labelling formats. The Co-op is pioneering new format labels on its products which consumers tell us are more helpful than those which conform to current regulations.

We see these areas as requiring the most urgent attention not least because of the increase in obesity and other health disorders.

Nutrition labelling landmarks

1984	COMA report recommends fat content labelling.		
1984/5	MAFF research shows consumer preference for HIGH, MEDIUM and LOW and this wording is adopted by the Co-op.		
1990	EC Nutrition Labelling Directive comes into force (Big Four and Full Eight).		
1993	Co-op research shows consumers confused by nutrition labelling (including sodium/salt).		
1997	Co-op publishes 'The Lie of the Label' report in conjunction with Consumers' Association. Co-op publishes code of practice for honest labelling.		
1998	Institute of Grocery Distribution (IGD), following extensive research, publishes voluntary guidelines within the constraints of the law, to make nutrition labelling more consumer friendly, including GDAs (Guideline Daily Amounts).		
2002	IFSA research confirms that nutrition labelling confuses consumers, who again indicate preference for HIGH, MEDIUM and LOW. The FSA researches models for better labelling. Consumers' Association publishes its own investigation into labelling, showing that dishonest labelling is alive and well.		

Warning: Eating can damage your health

Our appetite for fatty, sugary and salty food is having an adverse effect on our health. Nor is it good for the health of our children. With their weakness for the stars of TV, cinema and computer screens, children are particularly vulnerable to the heavy marketing of food products.

The prevalence of obesity in England has tripled over the last 20 years and continues to rise. Most adults in England are now overweight, and at least one in five is obese. In 1980, eight per cent of women were classified as obese, compared to six per cent of men. By 1998, the prevalence of obesity had nearly trebled to 21 per cent of women and 17 per cent of men, and there is no sign that the upward trend is moderating. Currently over half of women and two-thirds of men are either overweight or obese.

Most evidence suggests that the main reason for this rise is a combination of less active lifestyles and changes in eating patterns* ([See Endnote 1](#)).

Foods such as sausages, crisps, chocolates, sugary drinks and biscuits contain high proportions of fat, sugar and/or salt. They are not a problem if consumed in moderation as part of a balanced diet. But, as a Co-op report published in 2000 shows** ([See Endnote 14](#)), it is precisely the foods that should be consumed most moderately that are advertised most immoderately to children.

Government health experts have issued repeated warnings about the impact of diet on the health of the nation - specifically a diet that contains too much fat, sugar and salt. Why can these be harmful?

"In the UK we eat too much fat, particularly saturated fat. If we ate less we could reduce death and disability in the UK and we could save £1 billion in costs to the National Health Service each year."

Dr Mike Raynor, Director

British Heart Foundation Health Promotion Research Group, Oxford University

"There is strong evidence that links our current high salt consumption to high blood pressure, which is the main cause of strokes and a major cause of heart attacks."

*Professor Graham McGregor, Professor of Cardiovascular Medicine
St. George's Hospital Medical School' University of London*

Fat

Fat has over twice as many calories as the same weight of starch, sugars or protein. Too much fat, of any kind, causes obesity, which contributes to health problems including heart disease, respiratory and gall bladder problems, osteoarthritis and some cancers. Some fats are essential to maintain healthy skin and a healthy heart and to keep cells working efficiently. They are called polyunsaturated fats. Saturated fats, however, do not have these health benefits. They are associated instead with increases in cholesterol, which in turn clogs up arteries causing heart disease and strokes. We can cut down on saturates because our body doesn't need them.

Sugar

Sugar provides energy (calories), but refined sugar is devoid of other nutrients, hence the expression 'empty calories'. Too many calories can result in obesity, which is associated with a number of life - threatening conditions. Although there is little evidence that sugars are a direct cause of diseases such as heart disease or diabetes, they do contribute to tooth decay.

When locked in the natural structure of foods, such as fruit and vegetables, they are not thought to cause tooth decay. It is the extraction process that releases sugars which frees them to cause tooth decay. Whenever the cellular structure binding sugars is broken this applies, so fruit juices and honey also contribute to tooth decay.

Salt

Salt (NaCl) contains sodium (Na). Too much sodium can be associated with a number of chronic diseases such as increased blood pressure and strokes. It is also considered a risk factor for osteoporosis. Healthy eating messages tend to focus on controlling salt (not sodium), but labelling regulations call for sodium (not salt) to be listed under the Full Eight.

While fat, sugar and salt are the main causes for concern, there is evidence to suggest that excessive consumption of certain ingredients and additives* ([See Endnote 15](#)) may also impact on health.

Examples include:

Caffeine

High caffeine intake during pregnancy can increase the risk of spontaneous abortion and low birth weight. It can cause behavioural effects in some children, for example, nervousness, anxiety, jitteriness and irritability. It's not just coffee that contains caffeine: cola, tea and chocolate also contain it. In fact, just four cans of cola (with average caffeine content of 40mg per can) represent the Acceptable Daily Intake (ADI) of 160mg per day for a child

The EU** ([See Endnote 16](#)) is forcing manufacturers of high-caffeine drinks to declare the caffeine content on pack, but this applies only to those containing more than 150mg of caffeine per litre, and will therefore exclude products such as coffee, tea, chocolate and ordinary colas.

The Co-op believes that it is quite easy for children and pregnant women to exceed the ADI by consuming caffeine from a variety of sources without realising it, and therefore the regulation should be extended to include any product with a moderate caffeine content. We are introducing caffeine labelling on teas, coffees, colas and chocolates containing one per cent or more of the ADI for children, i.e. 1.6mg per serving.

Food colours

There is concern that additives, especially artificial colours, cause allergic and intolerant reactions, particularly in children. The Co-op has therefore adopted a policy controlling their use: banning some† ([See Endnote 17](#)) and restricting others†† ([see Endnote 18](#)). Where permission to use a colour is given, it is on a product by product basis, and only if no-colour or natural-colour alternatives have been pursued. If an artificial colour is used, the labelling of the product will bear the following statement directly below the ingredients list: 'Contains (name of colour(s)) which has been associated with food intolerance.'

"We each eat on average about 35kg of sugar a year, approximately twice the levels recommended by health and nutrition experts and independent committees. Most of this sugar is added to processed foods and drinks, where its only nutritional function is to provide empty calories."

*Professor Aubrey Sheiham, Professor of Dental Public Health
Department of Epidemiology & Public Health, University College London*

If people are to make informed purchases so they can eat more healthily, they need clear and honest information. Current labelling practice is not helping, as we show in the next four sections of the report.

We discuss each issue from these perspectives:

- current labelling practice;
- what consumers think about it, as found in NOP'S independent poll;
- what the Co-op is doing about it and what we are calling on others to do.

Fibs about Fat

" It is vital that people get to understand how much fat and saturated fat they are actually eating. An important way they can do this is by food manufacturers telling us - preferably in plain

English – how much fat and saturated fat there is in their products."

Dr Mike Raynor, Director

British Heart Foundation Health Promotion Research Group Oxford University



*so 10% fat, then.

The Co-op asked consumers, in independent research by NOP* ([See Endnote 19](#)), what they thought of labelling laws and the protection offered by regulations. The research measured consumer confusion around labelling practices, assessed concern about potentially misleading claims, and asked consumers what changes they would like to see in the way products are labelled.

Almost everyone (95 per cent) recognised it was important to reduce or control the amount of fat they eat. Eight in ten (86 per cent) said clear labelling would help tackle obesity. Yet companies sometimes imply that products are low in fat when they are not, or fail to give adequate prominence to the fat content.

[<<back to top>>](#)

Per Cent Fat-Free Claims

Joint Food Safety and Standards Group (JFSSG) 1999 guidelines** ([See Endnote 7](#)) for nutrition claims state: "Since 'X per cent fat-free' claims can be misunderstood, they should be avoided." and more strongly "... per cent fat free' claims should not be made."

Nevertheless, Sustain's research found many examples of these claims still around in the marketplace: for example, a leading brand of crisps that made a prominent 80 per cent fat-free claim on front of pack, while admitting an 18 per cent fat content on the back. (The company has since withdrawn this claim.)

The Co-op has never used fat-free claims on Co-op brands and the EU has recently tabled draft regulations to end this practice† ([See Endnote 20](#)). We believe the guidelines developed by JFSSG should be given statutory authority, so enforcement agencies can police an outright ban. Consumers agree.

When NOP showed consumers an example of an 80 per cent fat-free claim, six in ten (61 per cent) said they thought it was low fat. When the high fat content was pointed out to them, eight in ten agreed that per cent fat-free claims like this should be banned in law.

Hidden Fat Content

Where products are mainly fat in nature, for instance, butter, margarine and spreads, good practice is to provide an indication of the fat content on a main selling face. However Sustain's research found many examples of products which reserve the per cent fat declaration for the bottom face of the packaging.

This is particular concern for spreads which may legally be called low fat or reduced fat, but still contain a significant amount of fat. When we asked consumers to look at a leading margarine spread that claimed to be 'low fat', eight in ten (78 per cent) said they believed it to be low fat, even though the spread contained 38g of fat in every 100g. This is a typical example in the survey of consumer willingness to accept companies' claims at face value.

The Co-op has a 'Fat Up Front' policy on our spreads: we put the fat content on the main selling face where it can easily be seen.

Action on per cent fat free claims

- We will continue our self-imposed ban on per cent fat-free claims.
- We are calling on the government to support the swift introduction of regulations to prohibit per cent fat-free claims and, in the meantime, to give statutory authority to the JFSSG guidelines so there can be a crackdown on companies that continue to ignore them.

Action on hidden fat content

- We will continue our 'Fat Up Front' policy on spreads, specifying per cent fat on the main selling face.
- We are calling on industry to follow our lead.

[<<back to top>>](#)

Sugar Shams

"Not only is sugar the 'arch criminal' of dental decay, sugary foods also displace more nutritious foods from our diets. We do not need sugar and there are plenty of good reasons why we should all consume less."

*Professor Aurbrey Sheiham, Professor of Dental Public Health
Department of Epidemiology & Public Health, University College London*



*starch or sugar?

Sugars are carbohydrates. This fact is known to just one in four of us, according to NOP.

This lack of consumer understanding helps companies exploit the nutrition labeling rules to their advantage by hiding the amount of sugar in processed foods within the carbohydrate content declaration.

Starchy carbohydrates are an important part of a healthy diet. Sugar, on the other hand, is bad for teeth and contains only calories, which, in excess, contribute to obesity. Six in ten consumers (63 per cent) believe they need to control or reduce sugar to maintain a healthy diet.

Sustain's research found many examples of sugary foods which carried either no nutrition information or only partial information. These included a range of biscuits, confectionary, snacks, soft drinks and frozen desserts which either failed to declare nutrition information, or listed only the Big Four (energy, protein, carbohydrate and fat).

People know that sweets are high in sugar and most of us know that too many sweets are 'bad' for us. But what about products we don't associate with high sugar? As there is currently no obligation on a manufacturer to specify the sugar content, people can unwittingly buy a product they would avoid if they knew how much sugar it contained.

The Co-op believes this lack of information is unhelpful and that the law should be changed to make sugar content labeling mandatory. Consumers agree.

The research shows that three in every four consumers confuse sugar and carbohydrate, with 26 per cent having

no idea what the relationship is and 20 per cent believing they are completely different. When the truth is pointed out to them, eight in ten say they want to see sugar content listed separately.

Action on sugar

- We will continue to declare the sugar content on Co-op brand products, and not hide it under carbohydrates.
- We will continue to label Co-op brand products HIGH, MEDIUM or LOW sugar.
- We are calling on industry to follow our lead.

Secrecy on Salt

"About 80 per cent of the salt we eat comes from the salt added in food processing and manufacture. The fact that many processed foods are not clearly labelled with their salt content per serving to allow people to assess how much salt is in their food, is a national disgrace. Without this information people cannot monitor their salt consumption."

*Professor Graham McGregor, Professor of Cardiovascular Medicine
St George's Hospital Medical School, University of London*



*NaCl = 2.5 x Na

Unless a nutrition claim about sodium and/or salt is made, there is no legislative requirement to list the sodium and/or salt content of the food. Where only the Big Four are listed, neither sodium nor salt declarations are given. Where the Full Eight are listed, sodium content must be given, but giving salt content in the nutrition panel is prohibited.

There are two problems with sodium labelling. First, most consumers do not relate sodium to health messages about salt. Six in ten say salt is important information to look for when trying to eat healthily; only two in ten say the same about sodium.

Second, as the NOP study also found, consumers confuse sodium and salt. Nearly one in three (28 per cent) think salt and sodium are the same, and four in ten have no idea about the relationship. In fact, as a rough guide to converting sodium to its salt equivalent, the shopper has to multiply the sodium content by 2.5 ($\text{NaCl} = 2.5 \times \text{Na}$).

So the provision of information on labels about sodium only is very unhelpful. This is especially the case when information about sodium (but not salt) is given on high-salt foods. Where salt information is absent, consumers cannot hope to make an informed assessment of the healthiness of the food.

Sustain's survey found that it is generally unusual for branded products to declare their salt content. Where the Full Eight information is given in the nutrition panel, companies tend not to provide salt equivalence information elsewhere on the label.

Sustain found an example of this on the label of a market-leading can of baked beans in tomato sauce. The sodium content is listed as 0.5g/100g, but this equates to 5g salt per tin (compared to the maximum daily adult recommendation of 6g). This is of particular concern because the manufacturer also states that its beans contribute towards one fruit and veg portion per half can. Similar claims are also included on pasta shapes in tomato sauce, many of which also have a high salt content.

The Co-op believes information on labels should be aligned with information about healthy eating, and that therefore showing salt content only is more helpful than showing sodium content only. (This is especially important on foods that consumers would not expect to be high in salt, such as breakfast cereals and baked beans.)

Most consumers agree. In fact, only three per cent of consumers in the NOP study thought it most useful to show sodium content only.

Action on salt

- We will continue to declare the salt content on the front and back of pack on Co-op brand products.
- We are calling on industry to follow our lead.

Health Claims That Make You Sick

A supermarket shelf is an arena where products jostle for position, each striving to stand out from its rivals for the shopper's attention. Companies seek a competitive edge for their product. An increasingly common one is the claimed contribution of the product to a healthy diet.

Companies have the right to present their products in the best possible light. But this right can conflict with the consumers' right to make an informed choice about the product before they buy it.

Nutrition claims

An example is a market-leading chocolate spread making a nutrition claim for itself as rich in calcium, magnesium and vitamins. The product contains 33.5 per cent fat and an unspecified - but certainly high - amount of sugar.

We think parents buying this product for their children are likely to make a healthy eating association with the minerals and vitamins - why else promote them front of pack? We asked consumers in the NOP study. They agreed - eight in ten said the added vitamins claim could lead people to think the product is healthier than it is.

Yet the product's contribution to healthy eating is negligible or worse, especially if consumed as part of a diet already high in fat and sugar.

Consumers want to see action. Just under half (47 per cent) want an outright ban on these claims. Almost the same number (45 per cent) say that if the claims are to be allowed, then they should at least be balanced with information about fat and sugar content.

Cholesterol-free claims

Another example of an inappropriate claim is the exploitation of consumer fear and lack of understanding surrounding cholesterol.

Cholesterol in our blood has been linked to a high risk of heart attack and strokes, but the amount of cholesterol in food has only a small effect on the cholesterol in our blood. The amount of fat, particularly saturated fat, has a much bigger effect on blood cholesterol.

The linkage becomes irresponsible where high fat products make a cholesterol-free claim on the label. This can confuse people who have been advised to reduce blood cholesterol into thinking that using the product will help their condition, when this may not be the case.

Cholesterol claims are allowed in law, but strict rules apply. These rules set a maximum amount (0.005 per cent) of cholesterol that can be present and do not allow the company to claim the product is beneficial to health. The rules impose no conditions on the type of food allowing such claims to be made, e.g. on fatty foods containing high levels of saturates.

The JFSSG nutrition claims (November 1999) guidance* ([see endnote 7](#)) states, 'Since dietary cholesterol is not a major factor in coronary heart disease and there is a danger of confusion with blood cholesterol levels, low cholesterol claims should not be made.'

This advice has recently been reiterated by the FSA** ([see endnote 21](#)), which states, we recommend that foods don't make claims such as 'reduced' or 'low' cholesterol, or 'cholesterol free'

However, Sustain found many examples of such claims - in margarines, oven chips and frying oils.

Health claims

The law prohibits any claim that a food can prevent, treat or cure a disease. Provided there is no mention of disease, the law is silent, allowing messages which imply a health benefit, through words or imagery, to go unchecked.

The Joint Health Claims Initiative* ([see endnote 22](#)) provides an independent framework for substantiating health claims, but purely on a voluntary basis. Currently there is no requirement for companies to independently validate health claims prior to marketing only to defend the claims if challenged. This requires time, effort and resources by enforcement agencies.

The EU has just issued a working document** ([see endnote 20](#)) which, if adopted, will put both nutrition and health claims on a legal footing. We think there is a long way to go, but welcome it as a move in the right direction.

This document does not go so far as to permit claims to be linked with diseases. We think disease reduction links are helpful to consumers where they are well established and are the subject of official advice, for example, the link between folic acid consumption and the reduced risk of babies born with spina bifida. The Co-op is currently in defiance of the regulations by making such a statement on certain foods containing high levels of folic acid to ensure women planning pregnancy are made aware.

Action on nutrition claims

- We are calling for a change in the law, not for an outright ban on nutrition claims, but to oblige companies making nutrition claims for their products to list the Full Eight in the nutrition panel. We think this will allow consumers to balance the nutrition 'asset' claimed on the front against the nutrition 'liability' detailed on the back. We will continue to monitor customer reactions.

Action on cholesterol free claims

- The Co-op has never made such claims and we will continue our self-imposed ban.
- We are calling on government to press for a ban at EU level, and in the meantime to give statutory authority to the JFSSG guidelines.

Action on health claims

- The Co-op is calling for a legal framework to control health claims, setting conditions for those which follow well-established healthy eating advice and requiring pre-approval of all others. (Six in ten consumers in the NOP survey strongly welcomed controls on health claims as a means of tackling obesity.)
- We are also seeking to change the law to remove the prohibition on linking foods with diseases where these links can be justified by well-established science.

- As with nutrition claims, we are also calling for companies making a health claim, whether explicit or implicit, to be obliged to list the Full Eight in the nutrition panel.

New-Look Nutrition Panels

The focus for factual information about the nutrition value of a product is the nutrition panel, where verifiable information is presented in a prescribed format, first implemented in 1995* ([see endnote 23](#)). There is currently no obligation to list nutrition information, but if it is given, the regulations specify either the Big Four (energy, protein, carbohydrate, fat) or the Full Eight (the Big Four plus sugars, saturates, fibre, sodium).

Consumers don't understand the information in this panel. Not only are they confused about the relationship between salt and sodium, and the relationship between carbohydrate and sugar, but also about content as a proportion of the Guideline Daily Amounts (GDAs).

Consumers in the NOP study were shown a typical label giving content per serving information about fat (27.3g per 100g), saturated fat (13.4g per 100g) and sodium (1g per 100g). They were asked to say for each whether this was 'a lot', 'a fair amount', 'not very much' or 'don't know'.** ([see endnote 19/24](#))

The correct answer in all cases was 'a lot'. Just over half (58 per cent) of consumers got it right on fat. Just under half (46 per cent) got it right on saturated fat. Only 14 per cent got it right on sodium (with 45 per cent saying they had no idea).

So the Co-op is calling for radical changes to the format of the nutrition panel, to make it more helpful to consumers. We are trialling a new format on Co-op brand labels which consumers welcome as more helpful than the current formats laid down in the regulations.

Fig 1: Nutrition Information

Typical Values	Per Serving	Per 100g
Energy	820kj	1660Kj
	200kcal	400kcal
Protein	15.5g	29.0g
Carbohydrate	6.0g	1.4g
Fat	13.4g	27.3g

Fig 1 shows a typical Big Four panel. Among other weaknesses, this format allows companies to avoid giving health-critical information about saturated fat, sugar and salt content.

Fig 2: Nutrition Information

Typical Values	Per Serving	Per 100g
Energy	820kj	1660Kj
	200kcal	400kcal
Protein	15.5g	29.0g
Carbohydrate	6.0g	1.4g
(of which sugars	0.3g	0.7g)
Fat	13.4g	27.3g
(of which saturates	7.2g	13.4g)

Fibre	0.9g	2.0g
Sodium	0.5g	1.0g

Fig 2 shows a typical Full Eight panel. This obliges companies to state the amount of saturated fat and sugar, but still falls short of being helpful.

As well as not providing information about the salt content of the food, another major weakness is that there is no way of knowing, without further guidance, whether the figures represent a lot or a little of each nutrient. The Guideline Daily Amounts (GDAs) may or may not be displayed elsewhere at the company's discretion.

The Co-op New-Look Nutrition Panel

Fig 3: New Format Co-op Nutrition Panel

NUTRITION						
	This product typically provides			Guideline Daily Amounts		
	Per Burger (approx. 57g)	PER 100 g		Women	Men	Child (7-10 yrs)
Calories	140 kcal	245 kcal		2000 kcal	2500 kcal	1800 kcal
Fat	11 g	19 g	HIGH	70 g	95 g	65 g
(of which Saturates	5 g	9 g)	HIGH	20 g	30 g	18 g
Salt	0.6 g	1 g	HIGH	5 g	7 g	4.5 g
Protein	9 g	16 g	HIGH	36 g	44 g	32 g
Carbohydrate	1 g	2 g	LOW	250 g	350 g	225 g
(of which Sugars	Trace g	Trace g)	LOW	50 g	65 g	45 g
Fibre	0.6 g	1 g	LOW	18 g	18 g	14 g
Fruit & Veg	Nil	Nil		5 portions	5 portions	5 portions
If you eat fewer or more calories, adjust the fat and salt and other nutrients accordingly. Always try to eat 5 x 80g portions of fruit and vegetables per day.						

The Co-op is trialling a new format on Co-op products, containing the Full Eight information - and more. An example of the format, as it will appear on a pack of Co-op brand burgers, is in Fig 3 above. We're calling it the 'Full Nine'. Radical improvements include:

- A re-ordering of the Full Eight, giving priority to key healthy eating information: calories, fat, saturates and salt. Nine in ten consumers said the use of bold text and of coloured nutrition panels made key information easier to find and to read.
- HIGH, MEDIUM and LOW assessment next to each item as a guide for consumers (based on a scheme devised by the Coronary Prevention Group* ([see endnote 25](#))). Nine in ten consumers liked these and said they were useful.
- GDAs next to each item for easy reference. GDAs are given for women, men and children (seven - ten years). Nine in ten consumers (89 per cent) said this was more useful than existing nutrition labelling in helping them eat more healthily.
- Salt, not sodium, content shown - welcomed by nine in ten consumers.
- The addition of a ninth item: how many portions of fruit and vegetables are contained in the product, in the light of the healthy eating recommendation of five portions a day. This innovation is welcomed by eight in ten consumers on packaged products such as ready made meals
- Rounding up or down of decimal points to facilitate calculation, but only where the difference as a proportion of the GDA is negligible. Just under nine in ten (89 per cent) said they preferred whole numbers to decimals.
- Abandoning joules as a measure of energy, to allow space for more useful information and the use of the term 'calories' instead of energy.

Flashes on front

AS part of our drive for labels that make it easier for consumers to improve their diet, we have introduced flashes on front of pack showing calories, fat and salt per serving (see Fig 4 below). Other retailers do this only on their slimming and healthy eating ranges. We have introduced it across the Co-op brand range.

Fig 4



Co-op Action Plan

In light of Sustain's research and what consumers have told us in the NOP survey, the Co-op is taking action to introduce more honest labelling practice at three levels.

Co-op brand

1. We are trialling a new-look nutrition panel: 'Full Nine' plus HIGH, MEDIUM and LOW in the panel and GDAs alongside, re-ordering the nutrients, replacing sodium with salt, omitting kilojoules and indicating the number of fruit and vegetable portions contained within the product.
2. We have introduced front-of-pack flashes showing calories, fat and salt content across the Co-op brand range.
3. We will continue our self-imposed ban on per cent fat-free and cholesterol-free claims.
4. We will maintain our 'Fat Up Front' policy on high-fat products, showing the per cent fat of spreads and fats on the main selling face.
5. We are adding calorie information to alcoholic drinks.
6. We are detailing caffeine content on products which contain more than 1.6mg in a serving.

Industry

1. We are inviting manufacturers and retailers to abandon Big Four nutrition information in favour of Full Eight and to trial the Full Nine.
2. We are calling on companies to:
 - Join our ban on per cent fat-free and cholesterol-free claims.
 - Adopt our 'Fat Up Front' policy on high-fat products.
 - Put on the main selling face calories, fat and salt content.

Government

Experience shows that self-regulation often needs the threat of external regulation to be effective. In view of the advantages of eating a balanced diet, we believe the time has come to outlaw certain labelling practices. The Co-op is calling on government to:

1. Support the swift introduction of EU regulations on health and nutrition claims, including the removal of the prohibition on linking foods with diseases where this can be justified by well-established science.
2. Give statutory authority to the JFSSG guidelines and crack down on companies that continue to ignore them, especially on per cent fat-free and cholesterol-free claims.
3. Press within Europe for mandatory full nutrition information on all products in a consumer-friendly format.

The Co-op has always been at the forefront of retailing issues, leading industry and interpreting the law in the best interests of the consumer.

Responsible Retailing and the Co-op

The Co-op's responsible retailing campaign was launched in 1995 after the biggest ever survey of consumer views.

More than 30,000 people responded and the message was clear: shoppers want to make informed purchasing decisions based on concerns about animal welfare, the environment and human rights.

In response, we pledged to give consumers the full facts on products, including details of who makes Co-op Brand products. A Right to Know policy was implemented to provide consumers with the facts they need to make informed purchasing decisions.

The Co-op has a democratic base of individual members. Each member has an individual vote no matter how much money they have invested in the Co-op. They belong to the Co-operative Movement because they believe in a wide range of consumer and social issues. As a unique consumer-owned business, the Co-op has a duty to serve consumers, not industry or the City.

Among Our Campaigns Are:

2001 Green and Pleasant Land ([View it Here](#))

A strategy for sustainable food production, including a reduction in pesticide use and more support for home – grown organics.

2000 Blackmail ([View it Here](#))

A report on parental concerns about the advertising of salty, fatty and sugary food products to children.

2000 Food Crimes ([View it Here](#))

Launching a series of inquiries into the ethics of modern food production.

1999 Breaking the Barriers ([View it Here](#))

Co-operating for social inclusion.

1998 Jury's Verdict ([View it Here](#))

Reporting on complaints and adjudications under the Co-op's code of labelling practice.

1997 Lie of the Label ([View it Here](#))

A report calling for honest labelling.

1996 Ending the Pain ([View it Here](#))

Finding a solution to stop animal testing.

1995 The Plate of the Nation ([View it Here](#))

A report on the national diet.

1995 Responsible Retailing ([View it Here](#))

A report based on the UK's largest ever independent survey of ethical concerns.

Glossary of Terms

Nutrition Labelling

Any information appearing on labelling (other than in the ingredient list) relating to energy value or any nutrient. No obligation unless a nutrient claim is made. If so, you must list the named nutrient either as part of the Big Four (energy, protein, carbohydrate, fat) or Full Eight (energy, protein, carbohydrate, sugars, fat, saturates, fibre, sodium).

Nutrition Claim

A statement that the food contains a component that has particular nutritional properties. Permitted provided the Big Four or Full Eight are listed together with the amount of any nutrient for which a claim has been made.

Health Claim

A claim that consumption of a food carries a specific health benefit or avoids a specific health detriment (e.g. calcium aids in the development of strong bones and teeth). Currently unregulated.

Medicinal Claims

A health claim which states or implies a food can treat, prevent or cure a human disease (e.g. increasing folic acid in the diet can reduce the risks of spina bifida). Prohibited.

ADI

Acceptable Daily Intake - the amount of a substance an average person can eat every day for a lifetime without risk to health. No obligation to display.

GDA

Guideline Daily Amount - the predicted daily consumption of an average consumer eating a diet conforming to government healthy eating recommendations. No obligation to display.

Endnotes

1. The most recent is Tackling Obesity in England, Report by the Comptroller and Auditor General, February 2001. The full report can be accessed at www.nao.gov.uk/guidance/chiefexec2b.htm
 2. National Diet and Nutrition Survey: Young People aged 4 - 18 years, Volumes 1 and 2. The Stationery Office, June 2000.
 3. The Food Labelling (Amendment) Regulations 1998.
 4. The requirements of the current labelling rules are triggered by the presence of novel protein or DNA in the final food. This approach to the labelling is based on changes that can be detected analytically. Ingredients obtained from GM crops but which do not themselves contain novel protein or DNA do not have to be labelled. This is based simply on the fact that they cannot be distinguished analytically from similar ingredients from non-GM crops. Examples of ingredients that do not legally have to be labelled are refined soya and maize oils and emulsifiers such as lecithin made from soya.
- The Food Labelling (Amendment) Regulations 1999 and the Genetically Modified and Novel Foods Labelling (England) Regulations 2000.
5. The Beef Labelling (Enforcement) (England) Regulations 2000.
 6. The Food Labelling Regulations 1996: Guidance Notes on Place of Origin, Joint Food Safety and Standards Group, January 2000.
 7. Guidelines for the Use of Certain Nutrition Claims in Food Labelling and Advertising, Joint Food Safety and Standards Group, November 1999.
 8. Guidance Note on Quantitative Ingredient Declarations (QUID), Joint Food Safety and Standards Group, July 1999.
 9. Guidance Note on Nutrition Labelling, MAFF, May 1999.
 10. Code of Practice on the Declaration of Fish Content in Fish Products, March 1998.
 11. Proposal amending Directive 2000/13/EC as regards indication of the ingredients present in foodstuffs.
 12. Food labels - the hidden truth, Consumers' Association, April 2002.
 13. Consumer attitudes to food standards, Food Standards Agency, February 2002.
 14. Blackmail, Report by the Co-op, July 2000.

15. In a televised experiment broadcast in June 2002, researchers who put a class of children on a low-fat, low-sugar, additive-free diet for one week were able to demonstrate naturally improved attention and calmer behaviour with 'remarkable improvement' to one child's eczema.
16. EC Commission Directive 2002/67/EC on the labelling of foodstuffs containing quinine and of foodstuffs containing caffeine.
17. Tartrazine (E102), Sunset Yellow FCF/Orange Yellow S (E110), Azorubine/Carmoisine (E122), Amaranth (E123), Ponceau 4R/Cochineal Red A (E124), Red 2G (E128), Allura Red AC (E129), Brilliant Black BN/Black PN (E151), Brown FK (E154), Brown HT (E155), Aluminium (E173), Silver (E174), Gold (E175).
18. Quinoline Yellow (E104), Cochineal/Carminic Acid/Carmines (E120), Erythrosine (E127), Patent Blue V (E131), Indigotine/Indigo Carmine (E132), Brilliant Blue FCF (E133), Green S (E142), Canthaxanthin (E161g), Litholrubine (E180).
19. NOP Consumer Research conducted 1,061 face-to-face interviews with a representative sample of the UK population, completed in June 2002.
20. Draft proposals for Regulation of the European Parliament and of the Council on Nutrition, Functional and Health Claims made on Foods.
21. See www.food.gov.uk/multimedia/tellmeabout/Cholesterol.
22. The Joint Health Claims Initiative (JHCI), established in 1997, is a joint venture between consumer organisations, enforcement authorities and industry bodies to establish a code of practice for the use of health claims on foods. It offers pre-market advice to ensure health claims on foods are both scientifically truthful and legally acceptable.
23. The Food Labelling (Amendment) Regulations 1994.
24. Use Your Label: making sense of nutrition information, PB2362, MAFF, 1996.
25. Just Read the Label: understanding nutrition information in numeric, verbal and graphic formats, The Coronary Prevention Group, HMSO, 1992.