Front-of-pack nutrition labelling: where to now?

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Food labelling is an area of continuing concern to health organisations, the food industry, consumers and governments in both New Zealand and Australia. Some big decisions on such labelling affecting both countries are expected over the next year. These are likely to have long-term effects on health outcomes.

The background and issues

In response to the continuing issues the Council of Australian Governments (COAG) has asked the Australia and New Zealand Food Regulation Ministerial Council to undertake a comprehensive Review of Food Labelling Law and Policy. New Zealand is represented on the Ministerial Council by Minister of Food Safety Kate Wilkinson. The Review is being conducted from Canberra by a panel appointed by the Ministerial Council. The panel, which is currently considering submissions, is due to report to the Ministerial Council in late 2010 and to COAG in early 2011.

A major issue for public health is the possible introduction of an interpretive front-of-pack (FOP) nutrition labelling scheme. ‘Interpretive’ labels provide information that enables shoppers to readily identify healthy food choices without having to perform calculations or understand percentages. An example is the ‘traffic light’ system discussed below, in which colours indicate the extent to which a product should form part of a healthy diet.

Diet has a central role in maintaining good health and preventing major chronic diseases. An estimated 11,000 deaths in New Zealand in 1997 (40% of all deaths) have been attributed to the joint effect of poor diet and physical inactivity, with diet playing the larger part. These included around 85% of deaths from ischaemic heart disease, 80% from diabetes and 70% from stroke.

Interpretive nutrition labels can help shoppers to identify healthier food choices. New Zealand research indicates that those most at risk from chronic diseases—Māori, Pacific and low-income shoppers and their families—are likely to particularly benefit from such labels. It can also be expected that introduction of an interpretive scheme would result in food manufacturers looking for ways of improving the nutritional quality of their products. Under a traffic light scheme, for example, manufacturers would be strongly motivated to avoid having products given a red light, indicating a high level of fat, sugar or salt.

New evidence

We have analysed what submissions to the Review say about FOP nutrition labelling. All 449 submissions available on the Review website as at 26 August 2010 were classified by sector (e.g. food industry) and sub-sector (e.g. retail), and coded for direct or implied agreement or disagreement with a number of propositions. Results are reported only for the 26 submissions from food manufacturers (including beverage
manufacturers), the 46 submissions from the health sector (excluding submissions concerned only with alcohol labelling), and the 6 submissions from Australian state governments and territories.

**A clash of views**

Submissions from the health sector and state governments and territories were generally supportive of the traffic light system, while those from food manufacturers generally opposed it. Food manufacturers favoured the ‘Daily Intake Guide’ (DIG) scheme developed by the Australian Food and Grocery Council and supported by the New Zealand Food and Grocery Council, which shows percentage daily intake per serving for a number of nutrients. Traffic light schemes are ‘interpretive’; DIG is not.

Figure 1 shows how submissions from the health sector, food manufacturers and Australian state and territory governments differed in their views about traffic light schemes. The proposition that “a traffic light scheme would be a good approach to FOP nutrition labelling” was directly or implicitly agreed with by 25 of 46 health submissions (54%), and by 4 of 6 submissions from state and territory governments (67%). No submissions from these groups disagreed, with remaining submissions expressing no view. On the other hand 20 of 26 of submissions (77%) from food manufacturers disagreed with the proposition, with none agreeing.

**Figure 1. Percentage of submissions agreeing and disagreeing that a traffic light scheme would be a good approach to FOP nutrition labelling, by selected sub-sector**

Of the 25 health submissions agreeing that a traffic light scheme would be a good approach, 16 called for a mandatory traffic light scheme to be introduced.

Positions were reversed for the proposition that “the Daily Intake Guide scheme is a good approach to FOP nutrition labelling” (Figure 2). No submissions from the health sector agreed with this proposition.
sector or state and territory governments agreed with this proposition. Half of health sector submissions and one-third of those from state and territory governments disagreed. The proposition was, however, supported by 16 of 26 submissions (62%) from food manufacturers.

Figure 2. Percentage of submissions agreeing and disagreeing that the Daily Intake Guide scheme is a good approach to FOP nutrition labelling, by selected sub-sector

Submissions were received from the New Zealand Government and from two Australian federal departments. None of these expressed a view on the merits of either scheme.

Several submissions proposed solutions that might increase the likelihood of a compromise position being adopted that still produced long term health benefits. Given the inclusion of red lights (indicating less healthy products) is a major barrier to compromise, one submitter has suggested a traffic light scheme in which green and amber lights were mandatory, but with red lights voluntary.10

The submission from the New South Wales (NSW) government11 offered a different approach, proposing that:

The need to maintain consistency and avoid confusion creates a strong case for prescribing the labelling format and requirements that manufacturers must use if they choose to label products on health or nutrition grounds. This ‘voluntary/mandatory’ approach would not affect a manufacturer’s decision on whether to label but would prescribe the format that any labelling must follow (p2).11

The NSW submission listed a number of reasons that make the DIG scheme problematic, and argued for a traffic light scheme.
Where to now?

The diametrically opposed positions of food manufacturers and the health sector on FOP nutrition labelling leaves little room for compromise. Powerful business interests generally prevail in most circumstances when they conflict so directly with concerns about public health. Recently the European Parliament rejected the traffic light approach after intensive lobbying by food manufacturers.

There is now substantial evidence that adopting interpretive labelling is a significant and necessary step in reducing chronic disease and turning around the obesity epidemic. Over a third of health sector submissions regarded introduction of a mandatory traffic light scheme as the way forward. Other health submissions were less ambitious, sometimes because of concerns about the political feasibility of achieving a mandatory scheme, in the face of opposition from food manufacturers. If the panel conducting the Review chooses not to support a mandatory traffic light scheme it will, if it is to make recommendations that promote long-term health gains, need to look hard at any compromises proposed in some of the submissions that may reduce the impasse between food manufacturers and the health sector.

Competing interests: All three authors have done work for health sector agencies involved in nutrition policy advocacy. John White drafted the submission from FOE (Fight the Obesity Epidemic) to the Review of Food Labelling Law and Policy.

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