

Institution: University of Surrey
Unit of Assessment: UOA 4 Psychology, Psychiatry and Neuroscience
Title of case study: Front-of-pack nutrition labelling and allergen labelling policy development
<p>1. Summary of the impact (indicative maximum 100 words)</p> <p>Food, Consumer Behaviour and Health Research Centre (FCBH) at Surrey has conducted a number of studies on how people make use of, and understand the labels on food products. These studies have been used by UK and EU regulators in forming labelling policies and constructing food information regulations.</p> <p>The work at Surrey and collaborative work with European colleagues has examined a range of domains relevant to food governance for health and impacted specifically on front-of-pack (FOP) nutrition labelling and allergen labelling policy development.</p>
<p>2. Underpinning research (indicative maximum 500 words)</p> <p><u>Nutrition labelling</u></p> <p>Governments and industry promote nutrition labelling as a tool to help consumers make healthy, informed food choices. Voluntary provision of FOP nutrition labelling, often referred to as 'signpost' labelling, has become widespread, however, food manufacturers and retailers have introduced it in different forms and the plethora of schemes and their differing presentation on pack may cause confusion for the consumer (Malam et al., 2009). Existing FOP schemes range from the presence of a detailed label on the front of the pack communicating the nutritional content of a range of key nutrients, possibly overlaid with interpretative text or colour as a benchmark, through to the presence of a simple visual symbol or 'logo' indicating that the product is considered to be a more healthful choice.</p> <p>To underpin development of UK food policy, the UK Food Standards Agency (FSA) undertook a large-scale study in 2008 to extend the evidence base. The FCBH team based at Surrey led the design (BMRB Social Research & University of Surrey, 2008) of this UK governmental programme of research. An objective assessment of how FOP labels enable shoppers to make informed decisions, including measurement of how the different elements in existing UK FOP schemes influence decision making and comprehension was performed. Overall, the study concluded that a single hybrid FOP label including text, traffic light and %GDA would bring comprehension and behaviour in relation to healthier purchasing choices closer together. This work was complemented with a leadership role in the FLABEL consortium that carried out further EU-level research. FCBH work (Hodgkins et al., 2012) on framing the differences between labels in terms of directiveness was central to the design of all the FLABEL studies.</p> <p><u>Allergen labelling:</u></p> <p>Food allergy is an important public health issue however, little is known about how allergic consumers make food choices. Labelling on food products is an important tool to help nut allergic individuals make safe purchases. Nonetheless, prior research identified that nut allergic people often experience difficulty in correctly identifying the allergens on the labels and in interpreting advisory labelling such as 'may contain'. In order to develop a better understanding of how food allergic consumers make their food choices and food purchasing decisions in the current labelling environment, a UK funded FSA study involving thirty-two adult volunteers with a doctor-diagnosed</p>

peanut and/or tree nut allergy was designed and conducted by FCBH. Each participant took part in three tasks; an accompanied shop, an in-depth semi-structured interview and a product choice reasoning task (PCRT). Results demonstrated that participants used a range of strategies (rules of thumb) to make choices about what foods to eat and buy when food shopping (Barnett et al., 2011a, 2011b, 2013) and eating out (Leftwich et al., 2011) including; personal experiences, preferences and sensory judgements (participant based characteristics), product based characteristics, and characteristics of the food producer, including trust accorded to brands and supermarkets.

3. References to the research (indicative maximum of six references)

Nutrition labelling:

1. BMRB Social Research & University of Surrey (2008) Comprehension and use of UK nutrition signpost labelling schemes: Scientific Rationale and Design. London: Food Standards Agency.
<http://webarchive.nationalarchives.gov.uk/20120206100416/http://food.gov.uk/multimedia/pdfs/quantrationale.pdf>
2. Hodgkins, C., Barnett, J., Wasowicz-Kirylo, G., Stysko-Kunkowska, M., Gulcan, Y., Kustepeli, Y., Akgungor, S., Chryssochoidis, G., Fernández-Celemin, L., Storcksdieck, S., Gibbs, M. & Raats, M. (2012). Understanding how consumers categorise nutritional labels; a consumer derived typology for front-of-pack nutrition labelling. *Appetite* 59, 806–817.
3. Storcksdieck, S., Fernández-Celemin, L., Larrañaga, A., Egger, S., Wills, J., Hodgkins, C., Raats, M. (2010). Penetration of nutrition information on food labels across the EU-27 plus Turkey. *European Journal of Clinical Nutrition* 64, 1379-1385.

Allergen labelling:

4. Barnett J, Leftwich J, Muncer K, Grimshaw K, Shepherd R, Raats MM, Gowland MH, Lucas JS (2011a) How do peanut and nut-allergic consumers use information on the packaging to avoid allergens? *Allergy*, 66, (7), 969-978. (doi:10.1111/j.1398-9995.2011.02563.x).
5. Barnett J, Muncer K, Leftwich J, Shepherd R, Raats MM, Gowland MH, Grimshaw K, Lucas JS (2011b) Using 'may contain' labelling to inform food choice: a qualitative study of nut allergic consumers. *BMC Public Health*, 11, (1), 734. (doi:10.1186/1471-2458-11-734).
6. Barnett J, Vasileiou, K, Gowland HM, Raats MM, Lucas, JS (2013) Beyond labeling: what strategies do nut allergic individuals employ to make food choices? A Qualitative Study. *PLoS ONE* 8(1): e55293.

4. Details of the impact (indicative maximum 750 words)

In May 2012 the four UK governments launched a joint food labelling consultation [<http://www.dh.gov.uk/health/2012/05/food-labelling-consultation-launched/>]. One of the questions put to consultees resulted from FCBH's findings (Hodgkins et al., 2012). By October 2012 [<http://www.dh.gov.uk/health/2012/10/nutrition-labelling/>], Anna Soubry (Health Minister), announced that the UK Government would work towards a consistent FOP scheme based on a hybrid approach of %GDA and traffic light colour coding. This is in line with the findings of the FCBH research (Malam et al., 2009, Hodgkins et al., 2012) This approach gained the support of all the leading retailers in the UK, many of whom were previously resistant to harmonisation. Technical guidance for implementation of the new hybrid label was issued in June 2013 [<https://www.gov.uk/government/publications/front-of-pack-nutrition-labelling-guidance>]. This technical guidance cites FCBH research that showed that market penetration (e.g. see

Storcksdieck et al., 2010) is key to consumers noticing and becoming familiar with labelling information (van Herpen et al., 2012).

The allergen project findings have been used in the FSA's work on the development of thresholds/action levels for cross-contamination of pre-packed foods with allergenic ingredients. In addition, they have been cited by the Agency in relation to a need to move away from the phrase 'may contain' if and when such thresholds are implemented because of the preconceptions regarding its interpretation. The need to ensure consumers are pointed towards the ingredients list as the primary source of allergen information was fed into the UK Department for Environment, Food and Rural Affairs for use in negotiations on the EU Regulation No 1169/2011 on the provision of food information to consumers. The EU Regulation No 1169/2011 includes a requirement for allergens to be highlighted in the ingredients list. The results of the 'eating out' element of the research underpin the Agency's guidance to UK industry and regarding provision of allergen information for foods sold non-prepacked which is a new requirement of the new EU Food Information Regulation. The importance of the allergy advice box, identified by this research as the first point of allergen information, has been used in the FSA's correspondence with industry which now specifically emphasises the importance of manufacturers ensuring that the allergy advice box matches the ingredients list regarding allergens present in the food. The British Retail Consortium, in partnership with the Food and Drink Federation, has produced Guidance on Allergen Labelling [http://www.brc.org.uk/brc_policy_content.asp?iCat=46&iSubCat=658&spolicy=Food&sSubPolicy=Labelling#sthash.naADqpa8.dpuf] that refers to our research. The Food Standards Agency is currently conducting a survey of allergen labelling and allergen content of processed foods to gain a better understanding of the type of allergen advisory labelling present on pre-packed processed foods sold in the UK [<http://food.gov.uk/multimedia/pdfs/allergen-survey-protocol.pdf>] in order to quantify the risks highlighted by our work.

5. Sources to corroborate the impact (indicative maximum of 10 references)

Nutrition labelling

- a) Department of Health UK (2012) Consultation on front of pack nutrition labelling http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/@dh/@en/documents/digitalasset/dh_134640.pdf – Main detail in ANNEX D: Summary of Research on Front-of-Pack Labelling and on page 3

Allergen labelling

- b) BRC Guidance on Allergen Labelling and the Requirements in Regulation 1169/2011 [<http://www.brc.org.uk/downloads/Guidance%20on%20Allergen%20Labelling.pdf>]
- c) FSA website: "The study, carried out by the University of Surrey, involved participants being accompanied during a routine food shop and interviewed at length to find out what they were thinking when they chose each product. ... The results are being used to inform dietary advice to consumers with nut allergies and to steer the development of food allergy labelling policy. [see <http://food.gov.uk/news-updates/news/2011/june/allergyresearch#.UdcZyfnVCn8>]

Evidence of use of research in other countries

- d) Food and Drug Administration (2010, April 29) Front-of-Pack and Shelf Tag Nutrition Symbols; Establishment of Docket; Request for Comments and Information. *Federal Register*, 75(82), 22602. [<http://www.gpo.gov/fdsys/pkg/FR-2010-04-29/pdf/2010-9939.pdf>] – see pages 22604 and 22606
- e) Obesity Policy Coalition (2011). The Obesity Policy Coalition's submission to the Australian Government's Issues Paper to inform the development of a national food plan. Melbourne: The Author. [Accessed from

http://www.daff.gov.au/_data/assets/pdf_file/0003/2027928/134_Obesity_Policy_Coalition_submission.pdf] – see pages 9 and 16

- f) Wartella, E.A., Lichtenstein, A.H., Yaktine, A., & Nathan, R. (2011). Front-of-Package Nutrition Rating Systems and Symbols: Promoting Healthier Choices. Washington: The National Academies Press. [http://www.nap.edu/openbook.php?record_id=13221] – see pages 38, 40 and 41
- g) Head of Food Labelling, Food Policy Unit, Department for Environment Food and Rural Affairs (DEFRA) (contact details provided)
- h) Food Information and Promotions Manager, Obesity and Food Policy, Department of Health (contact details provided)
- i) Food Allergy and Intolerance Programme Manager, Food Allergy and Intolerance Branch, Food Standards Agency (contact details provided)
- j) British Retail Consortium (contact details provided) To confirm that the statement “Consumer research has suggested that consumers, who have been relying on these allergy boxes or statements to obtain allergen information, are likely to overlook the information provided in the ingredients list.” in the BRC Guidance on “Allergen Labelling and the Requirements in Regulation 1169/2011” [<http://www.brc.org.uk/downloads/Guidance%20on%20Allergen%20Labelling.pdf>] is referring to our work. Food Policy Director (contact details provided)