

FRONT OF PACK LABELLING

To improve diets at a population level, a range of policies and interventions are needed across multiple sectors. Implementation of front-of-pack nutrition labelling (FOPL) has been recommended as one element of such a multi-component approach.

As a minimum, many countries have mandatory nutrition tables on the back of food packaging, but the World Health Organization additionally recommends FOPL to promote healthy diets and help reduce NCD prevalence [1],[2],[3]. FOPL provides key nutritional information, typically including calorie, saturated fat, salt, and sugar content, in a visible format that helps consumers to judge at a glance the healthfulness of a product.

FOPL can also put pressure on the food industry to reformulate their products, improve the nutritional profile of their products and avoid displaying labels that indicate high levels of salt, saturated fat, sugar or calories.

Purpose of FOPL

Impact on Choice

FOPL is a recognised strategy in the fight against non-communicable diseases (NCDs), as it nudges consumers to choosing healthier options. Evidence shows that the most commonly used FOPL systems are able to direct consumers towards more healthful purchasing behaviour, via different mechanisms, dependent on the design of the label.

FOPL systems that use colours to indicate the nutrient profile of a product promote the purchase of more healthy products, as the colours increase the perception of healthfulness for healthier food options [4]. In contrast, FOPL systems that feature 'warning' labels discourage the purchase of less healthy products. Warning labels may elicit negative perception of unhealthful foods (e.g., perception of severe risk, lower grade of healthfulness, lower level or frequency of recommended consumption for unhealthful products) in the process of changing food choice [4].

The impact of FOPL on consumer choice is dependent on several factors, including the demographics of the consumers, knowledge of nutrition labels, frequency of grocery shopping, familiarity with the brand, and level of weight consciousness and health status. For example, women and people with special diet needs or higher perceived nutrition knowledge are more likely to look at – and be influenced by – FOPL [5].

Impact on Reformulation

The strength of FOPL in relation to salt reduction is that it also puts pressure on the food industry to reformulate, improve the nutritional profile of their products and thereby avoid having to display some form of warning label to indicate high levels of 'negative' nutrients e.g. salt, sugar or saturated fat on the front of their products. Evidence of this impact on reformulation exists from New Zealand, Ecuador, Sweden, the United States, Australia and the Netherlands [6],[7],[8],[9],[10],[11].

Types of FOPL

To date, more than 30 countries globally have implemented interpretive FOPL systems, including 6 countries that have adopted mandatory nutrient warning labels and 3 countries that have adopted mandatory colour-coded FOPL systems (i.e. Nutri-score or traffic light labels) [12].

When engaging with the food industry on salt reduction and building a case for salt reduction with policy makers, it is important to have a clear idea of the levels of salt present in foods that are a focus of the salt reduction strategy. Developing a comprehensive database should therefore be a key element of the strategy and should ideally include all packaged foods available in supermarkets, as well as data from meals and other food products available in the out of home sector. This information can be obtained directly from the manufacturer (via packaging or company websites), or via independent analysis of a product/meal.

FOPL generally falls into 2 main categories:

- **Noninterpretive FOPL systems**, such as the Guideline Daily Amount, convey nutritional content as numbers, allowing consumers to create their own judgements on healthfulness.
- Increasingly, countries globally are implementing **interpretive labels**, which present symbols, figures, colours or cautionary text to indicate the overall healthfulness or nutrient content of a product. These can be nutrient-specific or summary indicator systems.

Examples of the globally preferred interpretive labels include:

- **Nutrient-specific 'traffic light' labels** are currently used in Iran, Kingdom of Saudi Arabia, United Arab Emirates, as well as the UK and Ecuador. This type uses red, amber, or green labels to indicate high, moderate or low levels, respectively, of total fat, saturated fat, sugars, and salt per 100g/100ml.
- Summary indicator Nutri-Score is currently used in Morocco and across several European countries including France, Germany, Spain, Belgium, Portugal, Austria, Belgium, Luxembourg and Switzerland. This type uses a colour spectrum ranging from dark green to dark orange with letters from A to E. Products assigned an "A" have the healthiest nutritional profile, while those with an 'E' have the least healthy nutritional profile.
- **Summary indicator endorsement logos** are currently used in Abu Dhabi (Weqaya logo) and Tunisia, while a 'Keyhole' logo is used in Norway, Sweden, Denmark, Iceland, Lithuania and Macedonia. This type allows the display of a logo indicating a healthy choice on the front of pack if the product meets criteria for sugar, salt, fat fibre and wholegrain content i.e. products with less sugar, salt and fat, alongside more fibre and wholegrain can display the label.
- **Nutrient-specific warning labels** are used predominately in the Latin American region (Chile, Peru, Mexico) and to date have not been implemented in the Eastern Mediterranean Region. This type displays a textual warning e.g. 'high in [calorie/nutrient]' presented on octagonal signs in a black-and-white design.



Local Examples from WHO EMRO

In 2020, the WHO EMRO team published a paper which summarised existing FOPL systems in the Eastern Mediterranean region [13]. Below is a summary of this information.

Iran

Iran introduced traffic light nutrition labelling for front of packs in 2014. The labelling system—which covers energy, sugars, total fat, trans fats, and salt—was initially voluntary and has been mandatory since 2016. By May 2017, 80% of foods were labelled with traffic lights.

Saudi Arabia

Saudi Arabia introduced traffic light labelling in 2018. The system is adapted from the UK traffic light system, and uses the UK's thresholds for fat, saturated fat, total sugars, and salt on a 100 g/mL basis. The Saudi Food and Drug Authority initiated the measure as part of its efforts to promote public health and enable consumers to make healthier food choices, in order to prevent obesity and deal with the burden of NCDs across the country.

The system is initially being introduced as a voluntary approach but may become mandatory depending on public demand and food industry uptake of the voluntary labelling.

United Arab Emirates

The United Arab Emirates has implemented mandatory front-of-pack traffic light labelling for fat, saturated fat, sugars, and salt levels on pre-packaged foods as part of its National Program for Happiness and Wellbeing. The labelling scheme has been developed through cooperation between the Nutrition Department of the Ministry of Health and the Standards and Metrology Organization.

Morocco

A study is underway in Morocco to evaluate the perception and the objective understanding of five different front-of-pack nutrition logos, including Nutri-Score, by Moroccan consumers. The Moroccan Nutrition Program and action plan 2017–2021 for reducing consumption of salt, sugar, and fat announced that a label or logo to describe the overall nutritional quality of foods would be introduced by developing legislation.

Abu Dhabi

In Abu Dhabi, a health logo scheme, called Weqaya, has been in place on a voluntary basis since 2015. Under this scheme, food businesses which meet particular food safety and hygiene requirements can apply to display the Weqaya logo on foods/dishes or meals that meet certain nutritional or compositional criteria for meals/takeaway food, children's meals, or takeaway food and individual food items. The logo can also be applied to 17 food categories sold in supermarkets.

The supermarkets must also meet specific marketing and health promotion requirements (provision of tasting of healthy items, healthy recipes, cooking/shopping tips, nutrition education materials; organization of events; store layout to encourage healthy purchases, and reduce unhealthy checkout purchases) if they want to promote the Weqaya label on foods.

Tunisia

In Tunisia, a front-of-pack health logo has been developed to help consumers to identify healthier food choices. The health logo label, which is in the form of a tick, includes the wording "National Strategy of Prevention and Control of Obesity". The tick format was selected after testing different formats with consumers, both adults and children, and finding that the tick had the highest level of acceptance. To carry the logo, foods need to meet nutrient profile criteria derived from three sources: The WHO Regional Nutrient Profile model; the French SAIN, LIM model; and WHO guidelines.

Implementing FOPL

In order to implement FOPL in your country, there are several considerations which we summarise here. For more detailed information, please refer to WHO Europe's Manual to develop and implement front-of-pack nutrition labelling, and World Cancer Research Fund International's report Lessons on implementing a robust front of pack food label (See 'Resources' below)..

Set Clear Policy Objectives

To guide the development of the most appropriate FOPL for your country, it is necessary to identify the intended purpose of the FOPL system i.e.:

- As highlighted above, FOPL can help encourage to choose healthier products or avoid less healthy products, and enable consumers to compare the nutritional quality of foods.
- In contrast, to incentivise reformulation to improve the nutritional profile of a product, thresholds set in the nutrient profiling model should be ambitious but achievable.

Rely on the extensive evidence relating to FOPL and the impact on both choice and reformulation, and refer to thresholds and criteria for FOPL used in neighbouring countries and globally.

Involve Stakeholders

Designing and implementing a FOPL system will require involvement of various stakeholders, including a range of government departments (e.g. health, business, finance); public health experts and academics; NGOs; technical experts; consumers; and industry.

When involving the industry, it is important to protect the policy process from commercial conflicts of interest, by balancing industry and non-industry representations, establishing clear terms of reference, and implementing appropriate consultation procedures^{[14],[15]}. This is particularly important, as Governments proposing FOPL systems can encounter legal and non-legal challenges. By engaging and involving a range of stakeholders, you can ensure the FOPL system is supported by legitimate objectives and evidence, does not discriminate against products from different origins, is based on international consensus, and the implementation follows due process.

Select the FOPL System

There are various designs and types of interpretive labels, therefore you may find it beneficial to work with research teams at universities in your country to test designs and determine the most appropriate for your population. It is also useful to consider the local and regional context, as ideally all products sold in your country would display the label, including imported products. Who are your key trading partners, and do they have a FOPL system in place?

Ideally FOPL would be mandatory across all products, but in the short term it can be implemented voluntarily to encourage uptake and support of the system.

Determine the Nutrient Profile System

FOPL systems will be based on a nutrient profiling system, which classifies or ranks products by their nutritional content. The nutrient profile system can be nutrient-specific i.e. setting thresholds for nutrients, or a summary indicator, which applies an algorithm to determine the overall nutritional profile of a product.

As part of the process of determining the nutrient profile system, you will need to decide whether to apply the labels across the board or to specific food categories; the nutrients that you will include within the system (which would typically include salt, sugar and saturated fat as a minimum); the reference you will use to calculate the thresholds/algorithm e.g. per 100g/ml or per portion (note – per 100g/ml is preferred, as portion sizes are not standardised); and finally determining the threshold levels or scoring system you will use. It will be useful to consider regional or international examples as a reference.

Validate the FOPL System

FOPL systems have to be tested to validate that they will achieve set policy goals. The system should be tested to ensure it aligns with food-based dietary guidelines (i.e. to ensure the nutrient profiling system does not promote less healthy products or conversely infer that healthier products should not be consumed). The system must also be tested with consumers, to assess their perception, attitudes and understanding. WHO Europe describe various validation tests in their Manual to develop and implement front-of-pack nutrition labelling.

Establish Monitoring Procedures

It is important to consider how you will monitor the implementation and impact of the FOPL system from the outset. Implementation can be monitored by assessing the number of products that display the label, ideally by tracking products on an annual basis. The impact can be monitored by assessing purchasing data (to identify the impact of FOPL on consumer choice), and product nutritional data (to identify the impact on reformulation).

Resources

- WHO Europe, 2020. Manual to develop and implement front-of-pack nutrition labelling
- World Cancer Research Fund International, 2019. Building momentum: lessons on implementing a robust front-of-pack food label

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