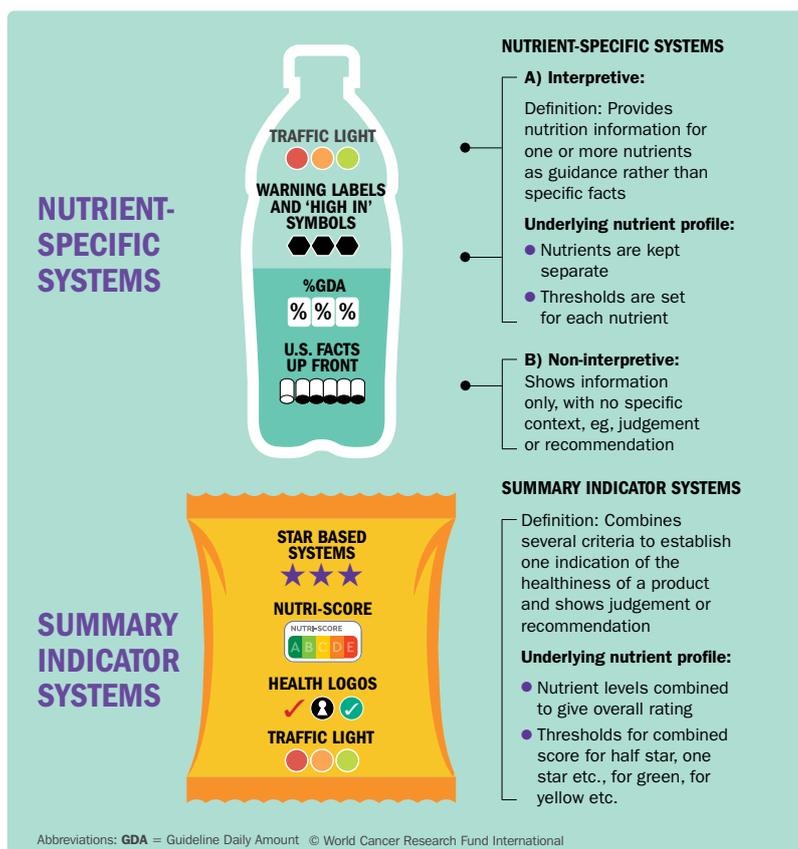




Building momentum: lessons on implementing a robust front-of-pack food label

Front-of-pack food labelling (FOPL) can help consumers to select healthier food products and better understand what is in them.

- There are many types of FOPL currently in use which fall into two broad categories: nutrient-specific and summary indicator systems (see Figure 1 for more details).
- Evidence shows that interpretive FOPL, which display recommendations or judgements on the healthiness of a product, and include some nutrient-specific and all summary indicator systems, are more effective. This is because they are more easily understood by consumers of all literacy levels and also indirectly motivate companies to put healthier products on the market (1).
- In contrast, non-interpretive FOPL systems show information only, with no specific judgement or recommendation to consumers, and have been demonstrated to be less effective (2).
- This report provides a framework for designing a robust interpretive FOPL. It outlines:
 - core elements to consider in FOPL development and implementation, and
 - lessons learned from countries that have successfully implemented robust FOPL.
- This report is aimed primarily at policymakers seeking to implement interpretive FOPL as a way to provide information to consumers that is quick and easy to access, understand and use.



Left, **Figure 1:** Types of FOPL

Methods

A review of the literature was undertaken using relevant key search terms on the implementation and associated challenges governments have encountered when developing, designing and implementing different types of interpretive FOPL.

In addition, twenty-three semi-structured interviews were carried out with policymakers, academics and advocates from different countries. A thematic analysis of the interviews was undertaken and informed the findings of this report.

Key Findings

Governments should consider the mandatory implementation of FOPL to help overcome limited uptake of voluntary systems.

- Level of uptake is an important consideration because it negatively affects the effectiveness of FOPL systems by limiting consumer awareness.

The main considerations in developing a robust FOPL system fall into three categories:

1. Legislative context and framework

It is important to know the relevant legislative framework to understand:

- What law or constitutional provision could restrict the use of a mandatory label.
- What legislative mechanisms are available to use in FOPL design.
- What evidence is needed and what the overall objectives of the policy need to be.
- Which government departments should be encouraged to work together on the design of the label to ensure policy coherence.

It is particularly important to engage the government's trade department, as part of a multi-sectoral approach, in order to ensure all international trade and investment requirements are considered and adhered to when designing and implementing FOPL.

2. Choice of nutrient profile model

A nutrient profile model classifies or ranks foods according to their nutritional composition. FOPL needs to be based on a credible nutrient profile model. However, not all nutrient profile models can be used for all types of FOPL, especially if they have been created for a different purpose (3). Some specific considerations for deciding on the nutrient profile model are outlined in Figure 2, and discussed in detail in the report.

Figure 2: Choices to make when deciding on an appropriate nutrient profile model for both nutrient-specific and summary indicator systems.

Which nutrients should be analysed?

- Most FOPL systems focus on 'nutrients of concern' (eg, fat, sugar).
- Some others assess the nutritional value of the food as a whole (eg, 'positive' nutrients to increase, such as protein, and 'negative' nutrients to limit, such as saturated fat).
- The most critical nutritional components to include in FOPL systems are: energy (as calories), saturated fat, trans fat, sodium and sugars (4).

What will be used as the reference?

- The three main references used by countries that have developed FOPL include: per serving, per 100g or per 100ml, per 100kJ.
- Governments find that the 'per 100g' or 'per 100kJ' reference is easier to regulate.
- Using per 100g or per 100ml allows for easier comparison between products, but it requires numeracy skills to calculate the amount per portion, if not stated.

What thresholds or scoring will be used?

- Thresholds are common for nutrient-specific systems. In some cases, such as for warning labels, they determine which products will display FOPL.
- Scoring or rating systems are used in summary indicator systems, such as Nutri-Score.
- Some countries set thresholds or scoring systems that are applicable across the food system (eg, Chile), while others set thresholds specific to product groups or product categories (eg, Singapore).

3. Choice of label format

When deciding on the type of label, it is important to base the decision on evidence and, where possible, test different label formats in the country to ensure they are fit for purpose. There are a number of FOPL characteristics that can help to capture consumers' attention, including colour, size and position on the pack (5, 6). The label needs to be:

- simple,
- consistently displayed on the package,
- designed to maximise its contrast with other package elements, and
- be sufficiently large to effectively compete with other package elements.

Regulations or guidelines should be clear and specific about the size and location of the label (as seen in the examples of warning labels in Chile and of Nutri-Score in France).

Lessons Learned

A series of lessons can be drawn from governments that have led the development or implementation of robust FOPL systems around the world.

Designing and developing FOPL involves a multitude of stakeholders, including government officials from various departments, public health experts, technical experts, members of civil society organisations, academics and industry representatives.

- In order to increase the effectiveness of FOPL, it is important to protect the development of FOPL from conflicts of interest.
- The report details strategies that have been successful in defending FOPL from both legal challenges (domestic, international trade and investment law) and non-legal challenges related to the design of the label (see Figure 3).

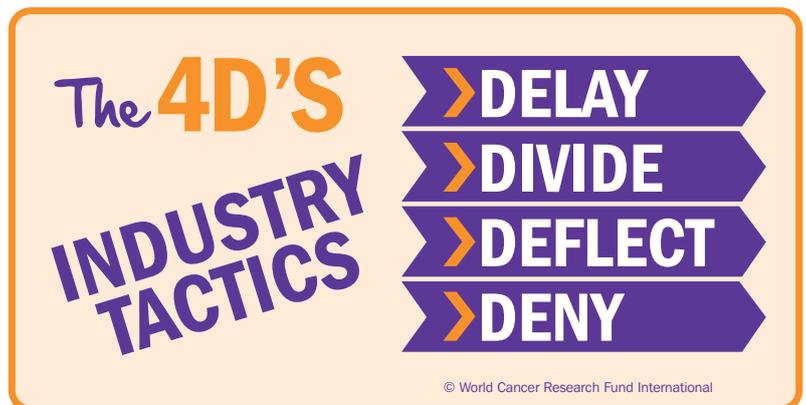


Figure 3: Common industry tactics used to challenge FOPL

Common elements of policymaking processes were identified as drivers to develop and implement a robust FOPL that can withstand opposition:

1. Considering the local context
2. Using evidence as a foundation
3. Setting clear policy objectives
4. Carefully designing the label
5. Finding how best to engage with stakeholders
6. Including monitoring and evaluation early on in planning

Policymaking is a political process

The events that lead to the successful implementation of FOPL are context specific and involve many different factors. Investigation of the motivations and enablers of various implemented FOPL systems can allow for an analysis of the political processes of designing a robust FOPL. The motivations and enablers that supported FOPL implementation in Chile, France and the UK are explored in detail in the report.



In order to use Nutri-Score, companies must adhere to certain requirements, such as size and colour

Chile's implementing regulations clearly outline specifications for the size, colour and location of the label.



Conclusion

The policy process to develop, design and implement FOPL is context specific, non-linear and shaped by many different actors and factors. Common barriers and challenges exist to the development and implementation of FOPL that are experienced by countries globally. Sharing lessons learned from these experiences is extremely useful to other countries seeking to implement FOPL, as well as other public health nutrition policies.

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For a summary of what is known to date on the effects of implemented FOPL systems, see WCRF International's evidence table, available online at www.wcrf.org/frontofpack



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Do you have any questions?

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