

Cancer Research UK Submission to the Food Standards Agency Consultation on Further Consumer Research on Signposting Labelling

1. Background

1.1 Cancer Research UK¹ is the world's largest independent organisation dedicated to cancer research, with an annual research spend of over £213 million.

1.2 After smoking, an unhealthy diet and excess bodyweight are the most important modifiable risk factors for cancer. Researchers estimate that a third of cancers are caused by dietary factors.^{2,3,4}

1.3 There is now evidence that obesity and overweight in children and adolescence can increase the risk of cancer in later life.⁵ Eating habits established in childhood often endure after many years. Several studies have shown that obese children are more likely to become obese adults.^{6,7}

1.4 Cancer Research UK called for further Government action to develop a clearer food labelling system in its response to the Department of Health 'Choosing Health?' consultation in June 2004. This was made in recognition of consumer calls for simpler, clearer labelling and calls for the development of a system that acknowledges inequalities in literacy and numeracy levels.

2. General Comments

2.1 Cancer Research UK welcomes the opportunity to submit comments to this consultation, to guide future research. We believe the development of a coherent labelling scheme has an important role in helping people make healthier choices when choosing and purchasing foodstuffs.

2.2 The current FSA work provides a significant opportunity to consolidate existing labelling and promotion systems for healthy choices. We hope that the proposed signposting scheme will fulfil an additional role of further educating the public about the nutritional value of food products and how they contribute to a healthy diet.

¹ Registered charity no. 1089464

² Doll, R. & Peto, R. The causes of cancer: quantitative estimates of avoidable risks of cancer in the United States today. *J Natl Cancer inst* 66, 1191-308 (1981).

³ WCRF & AICR. 37-145 (American Institute for Cancer Research, Washington, 1997)

⁴ Willett, W. Diet, nutrition, and avoidable cancer. *Environ Health Perspect* 103 Suppl 8, 165-70 (1995).

⁵ Yong, E. Alcohol, Diet, Obesity and Exercise Evidence Report. Cancer Research UK (2005).

⁶ Guo, S., Roche, A., Chumlea, W., Gardner, J. & Siervogel, R. The predictive value of childhood body mass index values for overweight at age 35 y. *Am J Clin Nutr* 59, 810-9 (1994).

⁷ Whitaker, R., Wright, J., Pepe, M., Seidel, K. & Dietz, W. Predicting obesity in young adulthood from childhood and parental obesity. *N Engl J med* 337, 869-73 (1997).

2.3 The development of a clearer labelling scheme compliments the aims of the Government's Public Health White Paper, published in November 2004. To achieve maximum benefit this should be developed alongside other health promoting initiatives announced in the White Paper and the accompanying Delivery Plan.

2.4 Our recent partnership with Tesco's, in which the Cancer Research UK logo was used to promote fruit and vegetables as a healthy food option, demonstrates the importance we consider such signposting can have in public health terms.

2.5 A coherent system for classifying food items in the context of the FSA labelling scheme, will serve as a useful reference scheme by which a wide range of organisations can promote a healthy diet and offer more concrete lifestyle advice. An agreed scheme will allow the same, consistent message to be given with confidence, and should enhance efforts to promote a healthy diet to reduce the risks of cancer and other diseases.

2.6 The development of a signposting labelling scheme is likely also to have an impact across the food industry. We believe that such a scheme provides an opportunity to encourage product reformulation, by giving an incentive to food companies to conform to healthy standards to achieve a desired symbol for their products. Evidence from Australia and New Zealand suggests that the 'pick the tick' signposting scheme has acted as an incentive to the food industry to alter the nutritional value of certain products.⁸

2.7 Signposting labelling can be used to inform more than just front of package sales. Other opportunities include providing guidance for vending and retail choices, the food products available in different catering environments (a percentage of products should have a green symbol for example) and of course, food advertising and promotion.

3. Core Recommendation

3.1 Cancer Research UK supports a single clear visual message, in order that it can be understood and utilised by as many people as possible. We believe that the simple traffic light option offers a simple and clear message.

3.2 Cancer Research UK believes it crucial that thorough evaluation is undertaken at regular intervals to monitor impact and outcome of the chosen scheme. This is essential to ensure that this can be adapted, if necessary, to inform the food choices of as many people as possible.

4. Design of quantitative consumer research

4.1 It is stated in the latest FSA research update that the quantitative analysis will be broken down by gender, age, life-stage, socio-economic group, and interest in diet-related health issues. However, it is not made clear whether the research will also question individuals responsible (or partly responsible) for food shopping. We feel this would be a useful addition in the research.

5. Inclusion of a fourth option

⁸ Young, L. & Swinburn, B. Impact of the Pick the Tick food information programme on the salt content of food in New Zealand. Health Promotion International, Vol. 17, No. 1, 13-19 (March 2002).

5.1 Cancer Research UK does not support the addition of a fourth option in future research, which we believe would unnecessarily over-complicate this study.

5.2 Further, Cancer Research UK does not consider that the suggested additional models add value to existing options under consideration. Our concerns with the proposed additional options are laid out below:

5.2.1 The *Monochrome GDA based concept* model fails to utilise the potential offered by visual, coloured symbols and may be seen as an attempt to bury the nutritional information on offer.

5.2.2 The *No Signposting* option would be a wasted opportunity and undermine the work carried out by the FSA to date. In addition, exploring this option could be potentially damaging to public confidence in the FSA, which has already been given a strong message by consumers and Government that further practical guidance is considered necessary to assist dietary choice.

For further information please contact the Cancer Research UK Public Affairs Department on publicaffairs@cancer.org.uk or 020 7061 8360.