

European Commission
Directorate-General for Health and Consumer Protection (DG SANCO)
Rue de la Loi 200
B-1049 Brussels
Belgium

June 2006

Dear Sir/Madam,

RE: Consultation on Labelling, Competitiveness, Consumer Information and Better Regulation for the EU

Background

Cancer Research UK¹ is the world's largest independent organisation dedicated to cancer research, with an annual research spend of over £217 million.

Half of all cancers could be prevented by changes to lifestyle. 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} In addition, drinking too much alcohol can substantially increase the risk of certain cancers.⁵

In the UK, the incidence of malignant melanoma is increasing at a rate faster than that of any other cancer, and more than 2,000 people die from skin cancer each year. The growth in UK incidence rates over the past twenty years is a clear indication of the need for continuing public education on how to reduce the risk of developing skin cancer and how to detect the early signs. Around 41,000 new cases of melanoma occur each year in the European Union (EU).

Cancer Research UK therefore supports initiatives which enable people to make healthy choices more easily and seek to encourage healthy eating, limited alcohol consumption, sensible sun behaviour, effective sunscreen use and that warn people of the dangers associated with sunbed use.

We believe such efforts to be an important part of a holistic strategy to improving health outcomes.

Cancer Research UK position

Cancer Research UK welcomes the opportunity to submit comments to this consultation.

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 Boyle, P. et al. European Code Against Cancer and scientific justification: third version. Ann. Oncol. 14, 1973-1005 (2003).

We believe it is important to create a supportive environment to help people make positive lifestyle changes and that instructive labelling can enable consumers to make more informed choices.

Clearly a balance has to be struck to ensure that labelling requirements are not overly burdensome for industry, however, it is essential that labels are clear, readable and easy to understand. We believe that the development of 'better regulation' and the adoption of clear and accurate labelling schemes are mutually reinforcing from a consumer perspective.

General Food Labelling

Cancer Research UK is supportive of food labelling that is clear and comprehensible so that it is used by as many people as possible. We believe it is important that those in the most disadvantaged groups and those with low levels of literacy and numeracy are able to make use of labels.

Responsible food labelling should also educate people about healthy eating. It is important that food labelling regulations continue to enable healthy eating messages such as the UK's "5 a day"⁶ logo to be used on food packaging. We are pleased that the current text of the Nutrition and Health Claims Regulation allows health-related charities to make evidence-based claims of this nature.

Some level of consistency is important when looking at labels. Nutrition labelling should enable consumers to make comparisons between different products within a food category as well as across food categories.

Signpost Labelling

Cancer Research UK supports the implementation of a front of pack signpost labelling scheme across the EU, to complement back of pack nutrition labelling, as we are confident that it will assist consumers to make educated dietary choices.

In the UK, the Food Standards Agency (FSA) has developed and recommended principles for a front of pack signpost labelling scheme. We support the principles and responded to a number of consultations during the scheme's development stating support for a system that offers consumers a simple clear visual message, in order that it is understood and utilised by as many people as possible.

We believe that the introduction of a signpost labelling scheme would have a number of advantages. Firstly, a signpost labelling scheme would serve as a useful reference system by which a wide range of organisations could promote a healthy diet and offer more concrete lifestyle advice. This would allow the same, consistent message to be given with confidence, and would enhance efforts to promote a healthy diet to reduce the risks of cancer and other diseases.

Secondly, a signpost labelling scheme could fulfil an additional role of further educating the public about the nutritional value of food products and how they contribute to a healthy diet.

⁶ The "5 a day" campaign is Department of Health funded and seeks to encourage the consumption of fruit and vegetables.

Thirdly, the introduction of a signposting labelling scheme would be likely to have an impact across the food industry. Comparative international evidence suggests that such schemes 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.⁷

Fourthly, 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.

The introduction of a signpost labelling scheme would also be particularly useful to help consumers ascertain the value of products they find most difficult to evaluate nutritionally, for example convenience and processed foods, such as cereals and ready meal foods.

We would be supportive of signpost labelling initiatives that targeted products specifically designed for children. There is now evidence that obesity and overweight in children and adolescence can increase the risk of cancer in later life. Eating habits established in childhood often endure after many years and several studies have shown that obese children are more likely to become obese adults.^{8,9}

There is a danger that support for the principles of signpost labelling could encourage the development of a plethora of different schemes by different retailers and companies. This would inevitably result in consumer confusion. We recommend that sufficient resource is dedicated to promoting one scheme across the EU and encouraging manufacturers and retailers to adopt an endorsed system above other similar models.

Health warnings on alcoholic beverages

It is important that sensible drinking messages are promoted- and that people understand what these mean.

We would support research to establish whether there is value in placing warning labels on alcoholic beverages, and if so, the type of labelling format that consumers would find most informative and easy to use.

Non-food Labelling

Cancer Research UK responded to the recent DG Industry and Enterprise consultation on the draft text for a European Commission Recommendation on the efficacy of sunscreen products and claims relating thereto.

We are strongly supportive of Commission action to simplify sunscreen labelling across the EU.

⁷ 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).

⁸ 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).

⁹ 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).

We believe that consumers should be given clear and accurate information about sunscreen products and agree that the proposed Recommendation will enable consumers to compare different sun protection products more easily and enable them to make more informed choices. It is important that consumers are informed that sunscreen should be used in conjunction with other sun protection strategies (like shade, clothing) because no sunscreen provides 100 per cent protection.

We would also like to see all sunbeds manufactured and sold in the EU bearing a permanent statement warning of the risks associated with use. Adults are free to make their own decisions about using sunbeds, but they should do so knowing the risks involved.

To discuss this submission further, or for any additional information or clarification on any point raised in this response, please contact the Cancer Research UK Public Affairs Department at publicaffairs@cancer.org.uk or on 00 44 20 7061 8360.

Yours sincerely,

A handwritten signature in black ink that reads "Richard Davidson". The signature is written in a cursive, slightly slanted style.

Richard Davidson
Director of Policy and Public Affairs, Cancer Research UK