

INFORMATION PAPER

FOOD LABEL MONITORING SURVEYS: KEY LABELLING ISSUES

Why is FSANZ conducting ongoing food label monitoring surveys?

Food Standards Australia New Zealand (FSANZ) has been running food label monitoring surveys since 2002 to see how food manufacturers are managing with key labelling requirements set out in the *Australia New Zealand Food Standards Code* (the Code). In any one year of the survey, between 1200-1300 food labels are collected and assessed for consistency with the Code.

From these ongoing surveys, FSANZ can check how effective current labelling regulations are, and FSANZ can use the results to make better decisions about labelling regulations in the future.

Correct labelling is a key to FSANZ meeting one of the *FSANZ Act 2001* objectives, which is to make sure that consumers have enough information on labels to help them make informed choices.

These ongoing surveys have not been conducted for enforcement purposes. Enforcement is the responsibility of the governments of Australia and New Zealand and the Australian States and Territories, and not FSANZ. However, FSANZ continually works with jurisdictions and the food industry to provide manufacturers with helpful information on labelling requirements.

When were the surveys held?

Surveys were conducted in two phases, each covering two years. Phase 1 surveys were conducted in 2002 and 2003. Phase 2 surveys were conducted in 2005 and 2006.

This paper gives a summary of results from the Phase 2 survey report *Ongoing Food Label Monitoring Survey in Australia and New Zealand: Report on the Assessment of 2006 Labels for Key Mandatory Labelling Elements for Consistency against Labelling Provisions*. This report includes the results from the assessment of labels collected in 2006. Since the same methods were used in both 2005 and 2006, the report also compares results with those from 2005, and, to a limited extent, with Phase 1 (2003) data. Thus, the 2006 report can give a general indication of changes in the consistency of information provided on food labels over time.

What products were surveyed?

Phase 2 surveys looked at the labels of about 1300 packaged food items in each year of the survey. Food items were selected from 14 food categories and were bought from a range of outlets including both supermarkets and small retailers. The sample broadly represented products available for sale in Australia and New Zealand at the time. Sample numbers for each food category were calculated based on the level of variety within that category.

What were the key labelling requirements surveyed?

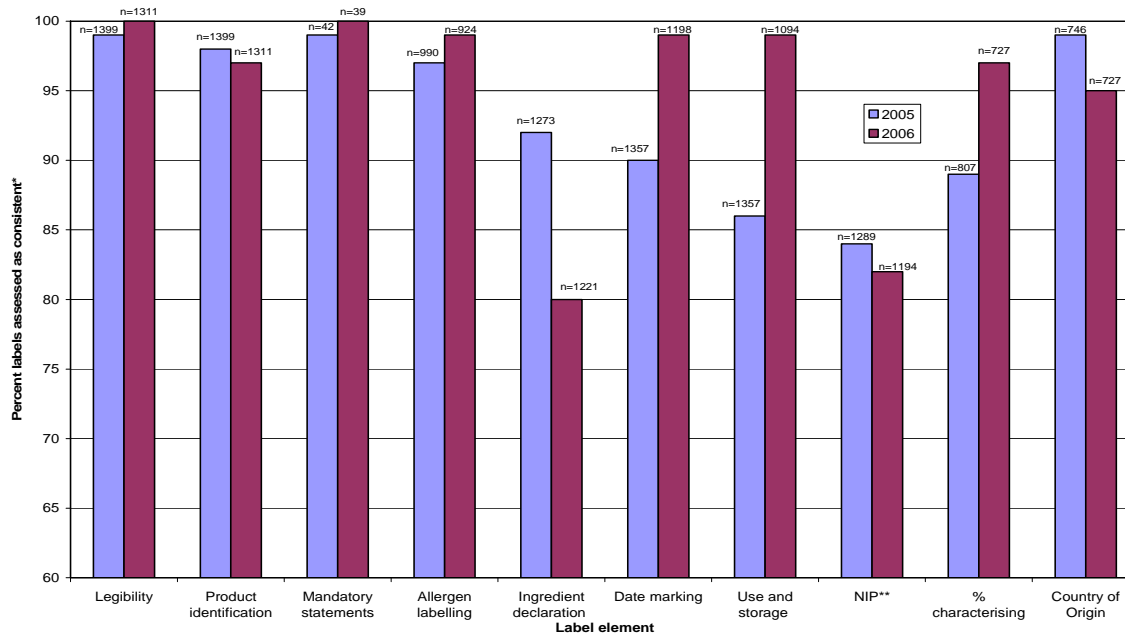
Each label was assessed for consistency against twelve key labelling elements. These were:

1. Legibility of print¹
2. Product identification
3. Mandatory warning and advisory statements
4. Allergen labelling
5. Ingredient declaration
6. Date marking
7. Directions for use and storage
8. Nutrition information panels (NIPs)
9. Percent characterising ingredients
10. Altered label (new label placed over incorrect one)
11. Product specific labelling²
12. Country of Origin.

The label elements Altered labels, Product specific labelling and Country of Origin labelling were assessed for the first time in Phase 2. Label elements assessed in Phase 1 but not Phase 2 included Usage instructions (assessments of Directions for use and storage were combined in Phase 2), Compound ingredients (assessments were combined with those for Ingredient declarations in Phase 2), and Irradiated food labelling and Genetically modified labelling (due to the low number of products carrying such labelling).

What did the surveys find?

A summary of the main findings are provided in Figure 1.



* Percentages calculated from the total number of labels assessed for that particular label element (n).

** Excluding labels that had only minor formatting or moderate inconsistencies in the NIP.

Figure 1: Percentage of labels assessed as consistent with key labelling elements

¹ Although Legibility of print and Altered label are referred to as 'label elements', neither are strictly so. In assessing labels against legibility requirements, each label element was assessed separately.

² Product specific labelling is a requirement of the Code, whereby specific information must be provided on the label of certain classes of food. As an example, where reference is made regarding the fat content of minced meat, the maximum proportion of fat in the minced meat, expressed in g/100g, must be declared on the label on the package of the food.

From Figure 1, the label elements that had very high levels of consistency in both years were:

- Label legibility
- Product identification
- Mandatory warning and advisory statements
- Allergen labelling
- Country of Origin statements.

There were three label elements that showed better levels of consistency in 2006 compared with 2005. These were:

- Date marking
- Directions for use and storage
- Percent characterising ingredients.

Key label elements that had lower levels of consistency in both years were:

- Ingredient declarations
- NIPs.

NIPs in particular presented some problems in both Phase 1 and Phase 2 of the surveys. However, NIP inconsistencies were mostly simply minor formatting inconsistencies, such as incorrect internal and external borders, and incorrect text case.

Note that the results for the label elements Altered label and Product specific labelling have not been shown in Figure 1 due to the comparatively small number of labels involved.

What were some of the more common reasons for label inconsistencies?

Nutrition information panel

In assessing the NIP the panel was expected to be in exactly the same format as that prescribed in Standard 1.2.8 of the Code.

Inconsistencies on the NIP were categorised as minor formatting inconsistencies, moderate inconsistencies, or significant omissions/inconsistencies. This depended on the type of impact they might have on a consumer's understanding of the information presented. In both 2005 and 2006, around 80% of labels assessed for NIPs were consistent with labelling requirements **if** labels with minor or moderate inconsistencies were excluded. However, if minor and moderate inconsistencies are counted, only 9% (2006) and 15% (2005) of labels were consistent.

In 2006, significant omissions/inconsistencies mainly related to:

- failure to indicate that NIP values were averages
- the absence of serving information i.e. 'servings per package' or 'serving size'.

In 2005, significant omissions/inconsistencies mainly related to:

- the absence of an NIP where one was required
- the absence of certain nutrients in the NIP.

In both years, most moderate inconsistencies related to the use of symbols in place of mathematical terms (e.g. '<' used instead of the term 'less than') and the incorrect positioning of serving information. The vast majority of minor inconsistencies related to incorrect internal and external borders, and the use of incorrect text case for serving information and nutrients.

Ingredient declarations

In 2006, a lot more labels were assessed as being inconsistent with this labelling requirement, compared with 2005. However, in both years, the primary reason for inconsistency was the absence or incorrect use of an additive class name in the ingredient list. The next most common reason was failure to provide a list of ingredients where required.

Percent characterising ingredients

This label element showed a better level of consistency in 2006 compared with 2005. In both years, all inconsistencies were due to percent characterising ingredient information being absent for ingredients emphasised in the name of the food or in the product description.

Directions for use and storage

Again, this label element showed a better level of consistency in 2006 compared with 2005. In 2006, the only reason for inconsistency was absence of directions for storage where required. In 2005, inconsistencies were due to the absence of directions for use or storage where they were required, and use and/or storage directions not being in English.

Date marking

In 2006, only 1 in 100 labels were inconsistent with the requirements for this label element. The sole reason for inconsistency was the absence of date marking where required.

By contrast, in 2005 one in ten labels assessed for this label element were inconsistent with the requirements. In these cases, date markings were absent, provided in an incorrect format, or illegible. Examples of incorrect date markings included a date with no 'Best before' or 'Use by' statement, or statements such as 'Valid until', 'Best if used by' and 'Expiry date'.

How do these results compare with Phase 1?

There are a number of differences in the methods used in Phase 2 surveys compared with Phase 1 surveys. Therefore, for most label elements, it is not possible to directly compare the results of Phase 1 with Phase 2.

However, for the label elements Legibility of print, Date marking and Percent characterising ingredients, assessments for Phase 1 labels (2003) were done in the same way as those for Phase 2 labels. This means that it is possible to compare the results for these three label elements across 2003, 2005 and 2006. Results suggest that consistency with the Code has improved over the three surveys for these three label elements.

Allergen labelling

The surveys looked more closely at those labels with consistent allergen labelling, to see how allergens were being declared and how prominently allergen statements were being displayed. Note that there are currently no labelling provisions in the Code that cover the placement or prominence of allergen information.

In both years, for a number of labels, declarations were provided in more than one place on the label. However, for both years, allergens were declared in the ingredient list on the majority of labels. Approximately one quarter featured a declaration elsewhere on the packet. In 2006, bold font was used in the allergen declaration on one half of the labels. In 2005, bold font was used in the allergen declaration on one quarter of the labels. The top three types of allergens being declared were soybean, gluten containing cereals and milk.

What other label monitoring activities will be undertaken?

FSANZ plans to run a third phase of the Label Monitoring Survey in 2010/2011. It is proposed that Phase 3 might be expanded to include several new components including a fortification monitoring program, to record information regarding the different types of vitamins and minerals being voluntarily added to foods and the levels at which they are being added.

Copies of the full reports mentioned in this document are available on the FSANZ website at <http://www.foodstandards.gov.au/monitoringandsurveillance/monitoringandevaluat1584.cfm>

User guides to the Code are available on the FSANZ website at <http://www.foodstandards.gov.au/thecode/codeassistance/>

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