Nutritional information in food labelling: what does it really mean to consumers?

Anyone who is involved in commercial food production in South Africa cannot help but be aware of the impending arrival of our much-awaited new food labelling regulations, namely Regulation 146,[1] and the subsequent amendments to it,[2,3] that have been published over the last two years.

Interested parties in commercial food production include food technologists developing new products and updating existing ones, marketing persons trying to get the "best bang for their buck" from their brands, and nutritionists and dieticians who provide the general public with accurate and user-friendly information on the foods they consume.

The regulation comes into effect on 1 March 2012. This is an opportune time to take a critical look at the potential health benefits of food labelling for the public, and in particular, revisit the long-standing subject of nutritional information, and how it is interpreted by the consumer.

Typically, nutritional information is placed on labels for two reasons. The first is to simply provide information about the product, in order to assist consumers to make their food choices, and, in theory, specifically to assist them to use nutritional criteria, when making these food choices. The second is to promote the particular nutritional benefits of a food as a marketing tool. It is appropriate then, that two of the papers in this edition of the *SAJCN* relate to these subjects.

Kempen et al, in their study of the relationship between health awareness, lifestyle behaviour, and food label usage among Gauteng consumers, highlight increasing awareness by consumers of the importance of nutritional choices, and lifestyle behaviour in maintaining their health. However, this did not necessarily translate into greater usage of nutritional label information. However, as reported elsewhere,[4] those consumers with a high awareness of the roles of nutrition and lifestyle choices with regard to health, tended to make significantly greater use of the nutritional information supplied.

Furthermore, the study was conducted telephonically, using the Gauteng telephone directory. This is indicative of a target population with sufficient income to justify possession of a home telephone, and who could be expected to have attained a reasonable standard of education. Therefore, in all likelihood, the study did not incorporate a significant proportion of low-income and poorly educated consumers, whose awareness of food labelling, other than knowledge of a brand name, would be extremely low. The study nevertheless indicates that nutritional information on food labels is not sufficiently utilised by mainstream consumers, irrespective of income or education levels, and one has to ask why this is so.

The problem is not unique to South Africa, and has been reported in both Europe [5] and the USA.[6] Comments most commonly recorded pertain to excessive complexity, and the lack of a simple format. This places the would-be provider of nutritional information in a difficult situation. This is because nutrition information of any sort, and particularly that of a quantitative nature, is not easy to communicate to consumers. In turn, this has led to the promotion of schemes such as "traffic-light labelling". Although seemingly consumer friendly, this labelling has been criticised for being misleading, and in particular, promoting a "bad food" vs. "good food" approach, while downplaying the "everything in moderation" approach. As such, their use is limited to specific countries such as the UK.[7] They have not been included in mainstream food regulations.[8] Instead, the use of guideline daily allowances (GDAs)[9] is becoming more widespread. However, these, too, have been criticised for being insufficiently consumer-friendly.[10]

Currently, there is no easy solution to this globally acknowledged concern, other than to make representations to government to place nutrition education higher on the list of priorities, in such a manner as to increase consumer awareness of nutrition information, and how to use it.

The second paper on this topic, by Gabriels et al, raises more fundamental legal and ethics questions on what type of nutritional information can reasonably be conveyed to consumers, with the objective of promoting the benefits of a particular project, with a view to commercial benefit for the supplier of the product. While this paper deals specifically with nutritional supplements, the espoused principles are applicable across the food and drink, in general.

Gabriels et al specifically, and rightly, raise the question of legislation to control the types of claims made about nutritional supplements. This is because, currently, there is no legislation whatsoever in South Africa covering this area. The paper makes alarming reading, highlighting the propensity of supplement manufacturers to make, what are in many cases, truly ludicrous claims about their efficacy. Claims are often made without any scientific substantiation, or by

using what the authors correctly describe as "pseudo-science", and backed by discreetly phrased disclaimers.

The solution to this problem is twofold. Firstly, there is an urgent need for regulatory control. It is reassuring to see that government is moving in the right direction, with the Medicines Control Council's publication of a document guidelines for the registration of complementary medicines.[11] Currently, this document is in the review stage, following receipt of comments from affected parties. It has been heavily criticised by the Health Products Association of South Africa[12] for adopting what they call a "pharmaceutical paradigm". However, when viewing some of the outrageous statements quoted in the paper written by Gabriels et al, it is tempting to suggest that the supplements industry, or at least its less reputable members, may have precipitated the need for legislation. This is particularly so, since the food industry, whose historical propensity for making exaggerated and unsubstantiated claims, pales into insignificance when compared to those of the supplements industry, is currently affected by legislation in the form of R146. This prohibits all, but a very limited selection, of health and nutrition claims. In the meantime, the Consumer Protection Act, with its broad-based clauses that relate to the dissemination of inaccurate or misleading information to the public, provides an additional recourse against untruthful, or insufficiently substantiated claims. It would be good to see formal legal action in this regard that would create a precedent, and put pressure on the supplements industry to introduce the necessary steps for the benefit of the general public.

The second area relates to the importance to those involved in nutrition communication. They need to provide correct and accurate information to the public, while dispelling the plethora of omnipresent inaccurate information, and on the Internet in particular.

A superb landmark document on this subject from the American Dietetic Association[13] gives first-class guidance in this area, and should be recommended reading for anyone who is involved in nutrition communication. It highlights a series of strategies that should be adopted by would-be communicators of nutrition information, provides hints on potential items of "junk science", and lists a series of questions to ask when considering ostensibly scientifically based information, used to communicate the benefits of particular substances and commercial products.

The concluding message from both papers should be that nutritional information on food and soft drink labels, be it quantitative or qualitative in nature, needs to be simple, truthful, and scientifically substantiated. Nutrition professionals have a huge role to play in this area, both as proponents of good quality nutrition information, and as watchdogs against inaccurate and misleading information.

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