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Request for Services by DG SANCO**

**Evaluation of the food labelling legislation**

**FINAL REPORT**

**Main Text**

**The European Commission  
The Directorate-General for  
Health and Consumer Protection  
(DG SANCO)**

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## **Introduction to the Final Report**

**The European Evaluation Consortium** was contracted by DG SANCO to undertake an evaluation of the food labelling legislation. It was intended that this review would allow the Community to reassess the effectiveness of its labelling policy and its legal basis, and to identify the needs and expectations of today's consumers for information on food labels, taking into account the technical and logistical constraints for implementation by industry.

This document is the final report made to DG SANCO on the review of European food labelling legislation. The report is split into two documents. The first document 'EFLL Final Report Main Text' provides a synopsis of the evidence gathered from the literature, the stakeholders, other research and the consumer survey undertaken, draws conclusions from the evaluation and makes recommendations to the Commission. The second document **EFLL Final Report Annexes** (another document) presents the evidence reviewed by the evaluation team.

The Final Report presents the conclusions and recommendations of the review of the food labelling legislation. This document was presented to DG SANCO of the European Commission on 18 October 2003

# **1 EXECUTIVE SUMMARY**

## **1.1 INTRODUCTION**

In his conclusions to the Round Tables on Agriculture and Food, Commissioner Byrne announced that the Commission would launch a process of evaluation of the labelling legislation with a view to its simplification and modernisation. The Community's current legal basis for food labelling is defined in Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs. This Directive codified the earlier Directive 79/112/EC that established general requirements for food labelling, applicable to all foodstuffs and pre-packaged food. This evaluation was conducted with a view to responding to the call for review of the EC food labelling.

This executive summary describes the aims and methodology of the evaluators and makes conclusions and recommendations to the European Commission.

## **1.2 THE APPROACH TO THE EVALUATION**

### ***1.2.1 The objectives of the evaluation***

The aim of the evaluation was to assess whether and how food-labelling legislation can be improved to better address the needs and expectations of today's consumers. The evaluation explored how information can best be provided in order to ensure consumer protection and facilitate informed choice. In addition to identifying if and where legislative change is required, the aim of the evaluation was to establish whether and how alternative means of communication can play a role in meeting certain consumer information requirements.

Key issues for the evaluation were:

- consistency with the objectives of Community policy
- ability to ensure consumer protection and informed choice
- feasibility of implementation for industry.

Specific questions were to be addressed covering mandatory and voluntary food labelling and the presentation of food information.

### ***1.2.2 The Terms of Reference***

The principal objectives of Directive 2000/13/EC are:

- to inform and protect the consumer
- to ensure the functioning of the internal market within the Community
- to enable the consumer to make an informed choice in full knowledge of the facts

### **1.2.3 Methodology**

The method of evaluating the food-labelling regime was proposed by The Evaluation Partnership and was agreed by the Commission in discussion with the Steering Group. The detailed approach to the evaluation is summarised below and consisted of 4 key elements.

- A study of food labelling legislation and Community policy
- Interviews with professionals in the field and a dedicated literature review
- A consumer comprehension/satisfaction survey involving circa 90 consumers interviewed in focus groups in 3 Member States (France, the UK, and Italy).
- Final analysis and reporting.

The analytical method used was to seek areas of convergence and divergence from the different stakeholders regarding the different questions raised in the Terms of Reference (**Annex 1**) and to ascertain the strength or otherwise of the different sources of evidence. Based on this analysis, a judgment was made as to the level of importance of addressing the issue in the legislation, leading to a final conclusion and, in some cases, recommendations.

It is important to bear in mind the scope of the evaluation, which was based on evidence drawn from desk-based analysis supported by a small number of interviews and focus group<sup>1</sup> work in 3 Member States. Up-to-date quantifiable consumer opinion was not available, although the evaluators were asked to draw upon the results of the Europe-wide quantitative research conducted by the University of Louvain in 1998 and by the Centre de Recherche pour l'Etude et l'Observation des Conditions de Vie in France in 2001. Given the comprehensive nature of the Terms of Reference and the scope of the body of evidence, the evaluation was not able to draw firm conclusions in many areas. Nevertheless, the evaluation is able to offer new insights and to draw some relevant conclusions and recommendations.

The work was carried out during the 10-month period to October 2003.

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<sup>1</sup> Focus groups allow insights into the motivations behind consumer choices and opinions. This important type of research allows a wide range of topics to be covered (see the focus group discussion guide in **Annex 2.6**, a separate document) but does not provide large-scale statistical evidence due to the limited number of consumers involved and the fact that specific answers are not recorded. Quantitative research canvasses the views of a much larger population on a limited number of specific key questions. This research provides statistical evidence, but does not necessarily highlight the reasons why consumers react in a particular way. The use of focus groups in this study reflected the need to cover a wide range of issues (see the Terms of Reference in **Annex 1**). Given that certain issues may now have become clearer, it may now be feasible to define a smaller number of questions to be addressed by quantitative research.

### **1.2.4 The Steering Group**

A Steering Group of external experts was constituted to oversee the work of the evaluators. Members of the groups were expected to participate in this process by contributing their skills and knowledge of the area of Food Labelling and the evaluation process itself. Members were expected to be objective and to act independently of the organisation to which they are attached.

### **1.2.5 Acknowledgements**

The evaluation team would like to express its thanks to all those who have contributed to and assisted in this review of the European Food Labelling Legislation, including members of the Steering Group, industry and consumer professionals, consumers in the focus groups and other experts and officials.

## **1.3 CONCLUSIONS**

The following summarises the main conclusions of the evaluation.

### **1.3.1 The adequacy of the legislation to cover policy objectives**

#### ***Policy needs are not fully met by the legislation on food labelling***

- The legislation does not fully cover the overall policy objective “**right to be informed**” due to the high number of cases of (partial) non application of the Directive 2000/13<sup>2</sup>;
- The presence of some **unclear, subjective rules** in Directive 2000/13 is an element that is regarded negatively<sup>3</sup>;
- Although it is understandable why food-labelling legislation has developed “piecemeal” over time, there is concern due to the number of legislative texts that

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<sup>2</sup> See the cases where there is no obligation to display the list of ingredients on the labels; the ingredients that do not have to be mentioned in the ingredient list; the exemption from the obligation to display a “best before” or “use by” date; the special limitations for bottles indelibly marked and small packaging; the missing provisions for food consumed in restaurants, hospitals, canteens and other similar mass caterers (more than the 5.5% of the daily meals eaten daily in the EU).

<sup>3</sup> See for ex. 2<sup>nd</sup> comma Art. 13 on physical characteristics of the binding labeling indications. It contains both objective requirements (they shall be indelible; they shall not be hidden etc) and indications that are open to subjective interpretations (they shall be easy to understand; they have to be easily visible and legible). See also the following vague formulation regarding indication of origin. The label shall contain “particulars of the place of origin or provenance where failure to give such particulars might mislead the consumer to a material degree as to the true origin or provenance of the foodstuff.”

impact on this sector. The objective to simplify and modernise the legislation, announced by Commissioner Byrne and by the EP, can be reached by recasting or codifying the legislation (at least the horizontal Directive). A preliminary analysis of the internal **consistency of the different pieces of legislation** presently in force is strongly suggested.

- The use of **consolidation techniques** would help consumers (and operators) by providing an understandable instrument on the Community legal provisions that are in force for the protection of their rights.
- The legislation on food labelling does not include specific **redressing mechanisms** to protect the consumers' right to be informed. In the absence of specific Community instruments, the (different) national provisions apply. The evaluators have no mandate to conclude on the point. However, it is suggested to assess whether the provision of common mechanisms throughout Europe would enhance the legislation's coverage the policy objectives.

***Industry difficulties: complexity, national differences, cost; especially SMEs***

- The number of legal texts that impact upon food, and the lack of co-ordination of updates to the legislation result in **unnecessary cost**, as label changes are not made within a standardised time framework with specific dates for progress towards implementation.
- Large companies have dedicated departments to ensure their compliance with the legislation, and industry associations are in place to facilitate the flow of communication on updates. However, **SMEs** are particularly challenged by varying interpretations of the Directive across the Member States, due to lack of awareness and understanding and the relative cost of updates on their smaller operation.
- The **size of the label** limits the amount of information, which can be displayed. This difficulty is particularly acute for small, multi-lingual and multi-flavour packs.

***Extending mandatory origin labelling to more primary products needs to be considered***

- Given the level of disagreement between sources of evidence and the perceived consumer interest, further investigation is required on the need and feasibility of extending the mandatory indication of **origin to other types of meat** in addition to beef.
- There is some suggestion that it is not necessary to legislate for the mandatory indication of the **origin of meat** in compound products. However, given consumer interest in the origin of meat, further investigation may be required for products that contain a very high proportion of meat.

- There is strong evidence to suggest that consumers are interested in the **extension of origin labelling** to other primary produce. This interest relates particularly to fresh produce and highly perishable foodstuffs, although not necessarily to non pre-packed foods.

***For consumers, it is the origin of production or preparation that is important***

- There is some evidence to suggest that consumers prefer that “origin” reflects the place of **production or preparation** of the foodstuff rather than where it was grown or raised. However, the type of indication expected is likely to relate to the nature of foodstuff, i.e. different approaches are required for shelf-stable products and highly perishable foodstuffs.
- Also suggested is that consideration be given to defining when ‘**produce of**’ may be used.

***There may be a requirement for further information on non pre-packaged food***

- Further information may be required on some non pre-packed products for example, **origin on meats other than beef**. However, the need for further information relates to the type of product, rather than the fact that it is non pre-packed.
- The evaluation has highlighted the **need to indicate allergens**. However, the evidence gathered has not provided further precision on the other types of information required on non pre-packed foods in addition to that highlighted (origin for fresh produce, durability for highly perishable produce). In fact, the consumer survey suggested that where further information is provided on non pre-packed products this is welcomed, but is not considered to be essential.
- Several sources of evidence highlight that the current legal requirement to indicate the **durability of loose, highly perishable foodstuffs** sold via retail outlets is not being consistently provided.
- Consumers see a need for further information on **allergens** when they are leisure eating in restaurants and catering establishments. There is also some suggestion that calories may be of interest. However, analysis of the legislation and views from the catering industry suggest that further investigation may be required on the practicalities of these proposals and on the needs of consumers.
- There is a strong suggestion that it is not always possible to display additional **printed information** on non pre-packed products (both in retail and catering). This difficulty needs to be taken into account if the display of further indications becomes mandatory for non pre-packed goods. If it is not feasible to display additional information in a printed format, the required information must be available at the point of sale/consumption.

***There is a consumer interest in production methods. How and where this should be presented requires further consideration***

- The evidence suggests that consumers are generally **interested in production** processes. However, whether other ways should be used in addition to or instead of the label requires further investigation.
- There is evidence to suggest that consumers are interested to know whether a food has been **previously frozen**.
- There is a divergence of views on the need to indicate the use of **colorants** in animal feed and the use of **post-harvest pesticides** on the label.

#### ***Contamination by allergens during production needs to be indicated***

- The presence of allergens in a foodstuff must be indicated. However, industry may require assistance to **standardise the approach on cross contamination**, the type of indication required on the label and which allergens should be included. Further investigation is required as it is not yet possible to set the thresholds for when allergens must be indicated and because the cost implications could be extensive.

#### ***1.3.2 The usefulness and acceptability of information contained in Article 3 of Directive 2000/13 (Name, list of ingredients, quantity, durability, conditions of use, business name and address, instructions for use, volume of alcohol over 1.2%).***

#### ***Current legislation on the name of food products is satisfactory***

- It is concluded that current legislative provision covering the indication of **name on food products** is sufficient to allow consumers to understand the product of their purchase.

#### ***Consumers welcome removal of the 25%<sup>4</sup>, but need supporting information***

- The removal of the 25% rule is considered to be a good change, which reflects consumers desire to be provided with all the information. There is strong convergence on the **need to list the ingredients of alcoholic beverages**.
- There is a **lack of understanding of technical terms** used in the ingredient list, including e-numbers and their proper names. This suggests that efforts need to be made to simplify the expression of certain elements in the ingredients list or to provide additional information for less well-known terminology via other means of communication

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<sup>4</sup> Under the 25% rule, it was not obligatory to label the components of compound ingredients that make up less than 25% of the final food product.

- There is a need to ensure that allergens are expressed using **homogenous terms**. More information on allergenic derivatives and thresholds for their inclusion is also needed.

***Listing more ingredients will lead to difficulties, needing back-up information***

- Wording may well have to be **too small on small packs**, especially multi-lingual and multi-flavour packs, with the removal of the 25% rule. However, consumers prefer to have the information even if it is small.
- Due to poor visibility, it is likely that information on elements such as allergens, additives and recipe changes will also need to be provided on **front of pack** and not just in the ingredients list.
- There is some evidence that consumers have a **lack of trust in the ingredients list**. Ways of increasing this trust may require investigation.
- Some of the research suggests that there is poor consumer understanding of **additives**, which means that further information is required. As the provision of more detailed information would increase the volume of information needed on the label, it may be necessary to consider other ways of informing the consumer.

***The expressions of quantity may need to be reviewed***

- Manufacturers believe that the expression of the Food Quantity Declaration of Ingredients (QUID) requires **narrower definition**.
- The **e-mark** is not considered to be useful to consumers, as they do not understand its meaning.
- There is some suggestion that the indication of a percentage of content on the front of pack may cause confusion with the indication of the QUID quantity in the ingredient list.

***Consumer understanding of the indication of durability may not yet be clear***

- The date is one of the most **essential pieces of information** used by consumers to make a purchase. The consumer research highlighted that consumers use dates in different ways for different products, exercising their own discretion
- The survey did not find a problem in **consumer understanding of the dating systems** 'best before' and 'use by', the latter term being the most important. However, retailers in particular believe that dating systems are confusing to consumers. This suggests that further investigation is required.
- Symbols and further education at the point of sale could be ways of **enhancing the indication of dates** and educating consumers.

- There is strong evidence to suggest that ‘not safe if used after’ should not be used to improve **clarity of the ‘use by’** date, as this would alarm consumers.
- There is divergence on the need and feasibility of implementing mandatory indications on the duration of a product, once its **package is open**.

***Legal provisions on storage conditions, conditions of use and instructions for use may require reformulation***

- The evidence suggests that current indications provided on storage conditions and ‘conditions of use’ are not fully satisfactory. Therefore, there may be a need to **reformulate the wording** on storage conditions and ‘conditions of use’ in the legislation, as the current requirement that these be provided only where there are ‘special’ storage conditions or ‘conditions of use’ needed may not be sufficient.
- As instructions on storage and conditions of use may vary from country to country. It may be necessary to investigate ways of **standardising the approach** taken across the EU. However, storage conditions and conditions of use need to be different for different product types.

***More information about how to treat a food product is desirable***

- There is no evidence to suggest that consumers do not understand the terms ‘conditions of use’ or ‘instructions for use’. However, there is evidence to suggest **comprehensive indications** on the pack on how to treat the product would be desirable and that consumers perceive of a lack of industry standard.
- In addition to the need to provide ‘instructions for use’ where the product could not be used without such indications, there is some convergence on the need to indicate ‘instructions for use’ where there may be **health and safety issues** at risk.

***No change in manufacturer, packer or seller identification is required***

- There is **little need to change** the current provision, given that all agree that provision of a contact name and address is useful and necessary.
- There is some evidence that consumers would **prefer the name of the familiar** rather than ultimate brand owner and that more information on the producer is required, but this evidence is not backed up by a wide range of stakeholders and requires further investigation.

***1.3.3 The need for additional legislation on voluntary information***

***There does not appear a need for legislation on voluntary descriptive terms***

- It is **not practical** to legislate on the use of terms fresh, natural, pure, traditional, etc. due to the existence of varying definitions and interpretation in different multi-lingual and multi-cultural contexts, as well as by type of product.
- The impact of introducing legal definitions may be reduced as other terms not defined by the legislation could then be used to replace those legislated for.
- There is research evidence that consumers are **normally able to differentiate** between marketing and pure information and that consumers have value systems in mind for these terms. However, there is some divergence on this point particularly from consumer organisations, which suggests that further investigation may be required. If there is a problem, a code of conduct for the food industry could be a way to set clear standards on non-binding labelling indications.
- Despite the above, there is some suggestion that **'fresh' could be defined**, as being for 'use by' products. However, there are limitations to the use by definition.
- Consumers are protected by the rules on misleading advertising and the consumer research suggests that in some countries there is a degree of confidence that the legislation is protecting consumers. However, there is a lack of EU **standardised 'redressing' mechanisms** (procedures used by consumers to take effective action against infringement of their rights), which may require attention.

***More information should be encouraged, if possible avoiding further legislation***

- There is a consensus that additional ways of informing the consumer on non mandatory-labelling issues should be encouraged, particularly those which are at the point of sale, as this frees up space on the label for the essential information.
- There is divergence on whether the use of precautionary labelling is satisfactory. There is some suggestion that precautionary indications, such as 'may contain nuts', are used as catch-all phrases and may not necessarily indicate the genuine cross-contamination of allergens.

**1.3.4 Consumer satisfaction with food labelling information**

***Standard EU codes would assist the visibility and legibility of information.***

- A standard EU food **coding system** using colour and/or symbols would be a useful aid in improving information visibility and legibility across a wide range of packaging types. However, this type of measure needs to focus on key areas of concern.

- Given the call for as much information as possible, as long as it is readable, and the unacceptability of multilingual copy, there would seem to be **little scope to encourage multi-lingual packaging**.
- No conclusions are drawn on the need to standardise font sizes used on the label. However, there was strong convergence that the legibility of indications on the label is **not determined by font size alone**. Legibility is also affected by a number of elements, including use of type-face, contrast, and colour.
- There is evidence to suggest that there is a need to ensure that **certain information is highly visible**, for example for those who suffer from allergies, etc. There should be a clear indication when there has been a recipe change, as consumers do not tend to read the pack when making a repeat purchase.
- It is essential that ‘use by’ and other **dates are clearly visible** in their position on the pack and that other numbers and codes in the same location do not compromise the legibility of the date.

***There are key “front of pack” items; other means can be used in support***

- There are grounds for adding essential ‘need for care information’, e.g. allergens, to brand name, descriptor and product life as essential **“front of pack”** indications on food, backed by legislation. Indications of weight and provenance on the front may also be desirable.
- **Essential information** required to make the purchase needs to be clearly visible<sup>5</sup>. All information could also be made available on the Internet, although this cannot be relied on as the only source, as mandatory information must be indicated on the label and other important indications are often read at home if they are not read at the point of sale.

***There is room for innovation in voluntary food information provision.***

- There is room for innovation and experimentation in the way that food information is extended beyond that included in the label, including back-up information about items on the label itself.
- The areas where **additional information initiatives** could be taken include the content (e.g. company information, crisis information), the means used (help lines, leaflets, reference books) and the points of access (at point of sale, in-store information, through TV, on websites).

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<sup>5</sup> Use of symbols, font size, positioning of information, etc. needs to take into account the needs of the vulnerable, ie those with allergies, poor vision, etc.

- The adoption of ways to inform consumers that are alternative and complementary to labels should be assessed against their **effectiveness** in protecting the right of consumers to be informed.

### **1.3.5 Consumer satisfaction with food information presentation (including the presentation of nutritional information)**

#### ***There is a high consumer interest in nutritional labelling***

Given the high-level of consumer interest in nutritional labelling, the following observations from the evaluation may be of interest to the other investigations being conducted by the Commission:

- The expression of sodium as salt leads to confusion.
- Standardisation of nutritional values is suggested to facilitate product comparison.
- 100gr/ml is a form of expression that facilitates comparisons between products.
- Rounding up of quantities to the nearest gram is helpful to consumers.
- High, medium, low fat and sugar indicators are not appropriate for all products.
- The level of consumer understanding of the nutritional panel needs investigation.
- Some suggest a need for full mandatory nutritional labelling, however space requirements on small, multi-lingual and multi-flavour packs may require some consideration, as do cost implications for SMEs.

Although these remarks are outside the scope of the evaluation, they arose during the evaluation work and could be of use in other studies.

#### ***No key conclusions on presentation of foodstuffs in shops***

- Shopping habits are clearly very **varied** and the evidence has offered no clues as to how to make the presentation of food in the shops friendlier apart from what has already been noted about food labelling, packaging and information support.
- This aspect may require **further consideration** if it is considered to have major impact on consumer understanding for example the position of certain products that may lead the consumer to misunderstand the properties of a product. However, the evaluation did not draw conclusions on this aspect.

#### ***The importance of different information categories varies by type of foodstuff***

Preferences for information on different food types are summarised in the following table:

Type of foodstuff	General	Importance of different information categories		
		Provenance	Appearance	Durability date
<b>BAKERY</b> Bread, cakes, pastries, etc.	The only interest is product type, taste and appearance		Yes	
<b>FRESH PRODUCE</b> meat, fish, fruit, veg,	Different rationales for information needs of	<b>Yes</b> (also needed)	Yes	Yes

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Type of foodstuff	General	Importance of different information categories		
		Provenance	Appearance	Durability date
deli	different countries	at the delis)		
<b>CHILLED</b> meals, meats, dairy juices, etc.	Full gamut of information is expected		<b>Yes</b> (meat and fish)	<b>Yes</b> (meat, fish and ready meals)
<b>FROZEN</b> meat, fish, veg, meals, components desserts	Full gamut of information is expected		<b>Yes</b> (especially for mixed ingredients)	
<b>TINNED/SHELF STABLE</b> soups, veg, sauces, milk, drinks	Little attention paid to labelling			
<b>DRY</b> pasta, rice, confectionary	No real attention paid to labelling			

The importance of labelling to consumers across the different categories of food can be divided into tinned, shelf stable items and dried foods (where a high level of consumer confidence means that labelling details may not be read at the time of purchase), chilled and frozen foods (where the full range of information is expected to be available) and fresh produce (where provenance and durability are important, but where there are different rationales behind other information needs in different countries).

Consumer interest in information about bakery foodstuffs is focussed on product type, appearance and likely taste.

## 1.4 RECOMMENDATIONS

The following recommendations are made.

### 1.4.1 General recommendations of the evaluation

- To discuss with national authorities areas highlighted by the evaluation, which may require further consumer education or other measures to be taken at the Member State level.
- That the focus group research be extended to the other and new Member States, and that the key and contentious results of the survey conducted as part of this evaluation be tested through quantitative research<sup>6</sup>.
- To consider conducting a more in-depth study of the food service industry to assess consumer expectations and requirements for information.

<sup>6</sup> A large-scale survey of consumers based on a questionnaire to test a specific number of issues through open and closed questions, from which statistics can be drawn.

### **1.4.2 Reinforcing legislation to support policy objectives**

In response to the conclusions about the structure of the legislation:

- To consider mechanisms to harmonise the way the Directive is implemented across Europe so that the rules may be applied in the same way in all Member States.
- To undertake an analysis of the **consistency** of the different pieces of legislation impacting on food labelling, and take action to eliminate inconsistencies and unclear rules.
- To recast or codify the legislation (at least the horizontal one) with a view to **simplifying and modernising** the legislation. To consolidate the whole legislation as to provide consumers and operators with an understandable guide to the legislation on food labelling.
- To assess whether the introduction of the provision of specific **redressing mechanisms** (procedures to allow consumers to take effective action when their legal rights have been infringed) would enhance the effectiveness of the legislation.
- To consolidate the **updating of food legislation** with related legislation where possible, allowing at least 2 years<sup>7</sup> for implementation, with specific dates for progress towards implementation.
- To take into account the constraints of small companies/operators when assessing the **feasibility** of any changes to the legislation.
- To investigate the **extension of mandatory origin labelling** to other meats in addition to beef and to compound products with a very high proportion of meat. Also to consider the type of indication of origin required by consumers, for example place of production, slaughter, etc
- To consider the need for the provision of information on the **origin of single ingredient fresh produce**, including fresh produce that is non pre-packed, particularly that which could incur potential safety issues for example meat and dairy products, etc.
- To consider what action needs to be taken to ensure that **local authorities enforce** food-related legislation across the EU, for example the apparent lack of consistent indication of minimum durability on highly perishable foodstuffs.
- To investigate further the need for **information on allergens** on non pre-packed foods, including in catering establishments and restaurants.

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<sup>7</sup> This time scale may need to be shorter if there are safety issues involved.

- To give further consideration to how consumers should be informed about the use of **colorants** in animal feed and **post-harvest pesticides**.
- To consider legislating for the label to indicate where ingredients, especially animal products that could incur safety issues, have been **previously frozen**.
- To investigate further the thresholds required for the indication of **allergens** in foodstuffs, the allergens that need to be indicated and the standardisation of terms to provide this information.
- To investigate the feasibility of the possible mandatory listing of ingredients on **alcoholic beverages**.

#### ***1.4.3 Reviewing the content of the current and pending legislation***

- To consider tightening up the **declaration of the QUID** to reduce the possibility of varying interpretations.
- To research further consumers' understanding of the indication of the **durability** of foodstuffs.
- To investigate further whether for certain types of product there is a need to indicate the **durability once open**.
- To investigate whether **dates** other than 'best before' and 'use by' should be prohibited to reduce possible confusion over dates.
- To consider the extension of the provision on '**instructions for use**' to cases where there may be health and safety issues.
- To consider extending the scope of the provision on '**conditions of use**' to cover useful information for the consumer, in addition to where 'special conditions' are required.
- To investigate the feasibility of simplifying the legislation to use one term to cover both 'instructions for use' and 'conditions of use.'

#### ***1.4.4 Measures to avoid misleading voluntary information***

In response to the conclusions about voluntary information:

- To investigate the possibility for harmonising the use of **precautionary labelling**, for example 'may contain nuts'.
- To study the **use of terms** such as fresh, natural, pure, traditional and other voluntary terms at a national level with a view to determining codes of practice and what needs to be covered by the legislation.

- To investigate a number of **specific** issues due to diverging views:

The labelling of sweeteners on the front of pack in addition to the ingredient list  
The level of consumer interest in negative health claims

#### ***1.4.3 Improving food information provision for the consumer***

In response to the conclusions about food information provision:

- To investigate the potential usefulness of the development of an **EU-wide food coding system** with colour and symbols to increase the visibility of care items (allergens, for vegetarians, recipe change, durability) on the front of pack.
- To introduce legislation that ensures that information **on allergens**, including recipe changes, is provided on the front of pack.
- To suggest to those undertaking the **nutritional information** review that:

Further consumer education is required.

There is a need to define the indication of sodium as salt.

The need to standardise the expression of nutritional values for comparisons with consideration given to use of 100gr/ml values.

Small, multi-lingual and multi-flavour packs labels require attention.

Cost considerations need to be taken into account.

#### ***1.4.4 Improving food information provision in the shops***

- To consider the need for further investigation on the impact of presentation in the shops on the effectiveness of Directive 2000/13.

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