Front of Pack labelling:
The French experience /evidence base for regulation

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Introduction

A Front of Pack (FoP) labelling scheme - A mean to:
• Help the consumer to make an healthier choice at the purchase level (under time pressure constraint)
• Push the producers to reformulate the products for a health benefit for all
• Help the Healthcare professionals for their nutritional counselling

The scientific background for the decision is crucial to:
• Evaluate the impact according to the objective (“true life”)
• Get the confidence of the consumers
• Involve the producers in using the logo (as it is voluntary...)

The perspective:
• The European discussion for this subject (planned by the regulation n°1169/2011 for the end of 2017)
History

1980 Sweden

2000 Finland

2005 UK

2006 NL

2014 NZ-Aus

2016 Chili

France...
The European legislation


of 20 December 2006

on nutrition and health claims made on foods


of 25 October 2011


Each 1/2 pack serving contains

<table>
<thead>
<tr>
<th></th>
<th>Calories</th>
<th>Sugar</th>
<th>Fat</th>
<th>Sat Fat</th>
<th>Salt</th>
</tr>
</thead>
<tbody>
<tr>
<td>MED</td>
<td>353</td>
<td>0.9g</td>
<td>20.3g</td>
<td>10.8g</td>
<td>1.1g</td>
</tr>
<tr>
<td>LOW</td>
<td>18%</td>
<td>1%</td>
<td>29%</td>
<td>54%</td>
<td>18%</td>
</tr>
</tbody>
</table>

of your guideline daily amount
France: the National Nutrition and Health Programme

• An intersectorial programme. Food intakes and physical activity
• Since 2001
• Quantified objectives (on obesity, undernutrition, food intakes, nutritional intakes, physical activity level...)
• Various strategies: Voluntary and Mandatory / Public and Private

LOI n° 2016-41 du 26 janvier 2016 de modernisation de notre système de santé (1)

A global emphasis on prevention

Art. L. 3232-8.- In order to facilitate the choice of the consumer with regard to the supply of energy and nutrients to his diet [...] the mandatory nutrition declaration provided for by the regulation (EU) n°1169/2011 may be accompanied by a presentation or a supplementary expression by means of graphs or symbols, under the conditions laid down in Article 35 of that Regulation
A wide consultation involving consumers, producers, retailers and scientists

✓ A proposal, accepted by all, made by the “Fonds Français pour l’Alimentation et la Santé” to conduct a study in “real life conditions” to analyse the impact of a FoP nutritional labelling on the nutritional quality of food purchases

✓ Why?
  • No study proved its impact in real life
  • An important step to federate the various actors
  • Based on the voluntary will (by the European regulation)
An agreed governance for the study

✓ A Steering Committee (Co Chaired by the DGS and the chairman of the FFAS; consumers, research institutes, economic actors; the National Health Insurance; DG Santé is invited)

✓ An independent Scientific Committee (Chaired by a High Level Civil Servant) with 12 multidisciplinary experts (with declarations of interest)

✓ An operational responsibility (FFAS)

Previous works

➢ About 30 publications in the international scientific literature on the 5C (Nutriscore) University of Bobigny Paris 13 (Pr S. Hercberg, Dr C. Julia et al): themes from the spontaneous understanding to the impact of the score on health risks
Objective: to differentiate systems on the basis of their impact on the nutritional composition of shopping baskets

The nutritional quality of the baskets is evaluated with a measuring system allowing comparisons between basket

The main criteria for evaluation

The UK Ofcom Nutrient Profiling Model

Defining ‘healthy’ and ‘unhealthy’ foods and drinks for TV advertising to children

Mike Rayner, Peter Scarborough, British Heart Foundation Health Promotion Research Group, Department of Public Health, University of Oxford
The main criteria for evaluation

\[
\overline{FSA}_{i, PRE, s} = \frac{1}{\sum_{p,t \in PRE} Q_{ipts}} \times \sum_{p,t \in PRE} FSA_{ipts} \times Q_{ipts}
\]  \hspace{1cm} (1)

\[
\overline{FSA}_{i, POST, s} = \frac{1}{\sum_{p,t \in POST} Q_{ipts}} \times \sum_{p,t \in POST} FSA_{ipts} \times Q_{ipts}
\]  \hspace{1cm} (2)
Evaluation in « true life conditions »

« NUTRI SCORE »

« SENS »

« NUTRI COULEURS »

"NUTRI REPERE »
Implementation (1)

10 weeks
From September 26 to December 4, 2016

4 Supermarkets shelves
-> Fresh prepared foods
(not snacking, processed meat, sea products)

-> Industrial Viennoiserie
(sweet breads, croissants...)

-> Breads and industrial pastries
(soft breads, sliced breads, special breads...)

-> Prepared canned foods
(Choucroute, cassoulet, ravioli...)
Implementation (2)

INRA software

A total of 1,9 Millions FoP labelling!
Implementation (3)

60 supermarkets
- 10 per system and 20 control
- Chosen at random / with **50% in under-privileged areas**
- 3 retailers (Casino, Carrefour, Auchan)

4 regions
- Ile de France
- Hauts de France
- Haute Normandie
- Auvergne-Rhône-Alpes

A total of 3 Millions cashier registrations!
Information to consumers

-> Specific leaflets, « Stop Shelves », totem

Products with the logo

• From 29 industrial companies, and the 3 retailers brands
• About 1300 products: 76% of fresh prepared foods, 63% of prepared canned foods, 86% of industrial breads, pastries and viennoiseries

Very Strict controls in each supermarket

Daily (internal supermarket personnel), twice a week (dieticians), 2 per professional audits.

The main tool: The cashier receipts (« loyalty card »)
Implementation (5)

Direction Générale de la Santé **380 K€**
Assurance Maladie **763 K€**
Fonds Français Alimentation **1.057 K€**

**Total 2.200 K€**
Implementation (6)
Implementation (7)
Complementary studies

1) A qualitative view:

**Objective:** estimate the readability, comprehension, interpretation, purchase intent and satisfaction level of the consumers

**In a random sample of 20 supermarkets:**

- **Before implementation** (from September 3 to September 17)
  - 1844 interviews
  - **During implementation** (from November 14 to December 3)
    - 1737 interviews
  - **After the test** (from December 14 to January 10, 2017)
    - 715 on line questionnaires

2) An experimental economy methodology: a virtual supermarket with all the products with a logo (5 logos tested) where consumers have to choose (and buy) products for the food consumption of two days

The improvement of the nutritional quality of the food basket (without and with a logo) is analysed
Next steps!

**Treatment of the data** by a mix team of the Toulouse School of Economics and the National Institute of agronomic research and CREDOC : December 2016-February 2017 (**Done!**)  

**Report to the Scientific Committee:** Next week  

**Report to the Steering Committee:** Next week  

**Decision of the public authorities:** before the end of March 2017  

**Legal mandatory formal opinion** of the French Agency for Food Security (ANSES): beginning of April 2017  

**Interministerial Order:** before mid April 2017
Thank you for your attention and your questions

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