

UK Metric Association response to Department of Health consultation on Front of Pack food labelling issued May 2012.

The numbers below refer to questions in the consultation document.

I.

UKMA believes that consistency of Front of Pack (FoP) labelling is vital for consumers to be able to compare products. UKMA believes that greater consistency internationally as well as within the UK is to be desired.

UKMA is willing to work with UK Governments to achieve this.

II.

Our main concern with current FoP labelling is that the labelling of energy content is non-compliant with the relevant weights and measures regulations.

The Units of Measurement Regulations 1995 (SI 1995 No.1804 as amended) requires that the joule (or one of its SI multiples) be used for energy, and Annex XV of the FIR (EU 1169/2011) requires that both kJ and kcal should be used - "The units of measurement to be used in the nutrition declaration for energy (kilojoules (kJ) and kilocalories (kcal))"

Also, currently the term "Calories" (GDA) and "CALs" (TLCC) are used in the same context as "Sugar" and "Fat" (in this context the term "Energy" is the appropriate term). This change would make FoP information consistent with the Nutrition Information Panel, which already uses the correct term "Energy".

Thus, where currently there is one icon showing e.g. "Calories 198 10%", to comply with the FIR, we propose that there should be 2 icons showing e.g. "Energy 834 kJ 10%" and "Energy 198 kcal 10%".

III.

no comment

IV.

We can see no reason why the following 2 categories of food should be exempt:

1. Unprocessed products that comprise a single ingredient or category of ingredients;
2. Processed products which the only processing they have been subjected to is maturing and that comprise a single ingredient or category of ingredients;

V.

Where values for less than the whole package contents are used, Energy per 100g should be shown. Portion sizes tend to be inconsistent and arbitrary. Consistency in energy content units is vital for comparison between products.

VI.

no comment

VII.

no comment

VIII.

no comment

IX.

If %GDAs are to be used, then they should be used on all FoP labels. To do otherwise would defeat the object of a consistent standard.

X.

We have no preference for any one particular scheme, but would reiterate here the points made in our answer to question II regarding "Energy" and kJ.

XI.

An agreed common standard for FoP labelling across the whole EU, or even more internationally, would best achieve the Government's ambition. An international standard would also benefit UK exporters by reducing the amount of different packaging needed for different markets.

XII.

no comment

XIII.

no comment

XIV.

UKMA supports the principal of uniform labelling across the EU and internationally.

XV.

We would reiterate here the points made in our answer to question II regarding "Energy" and kJ.

XVI.

UK manufacturers will benefit from an EU-wide harmonisation of FoP labelling by reducing the need for different packaging in markets with different FoP regulations.

The use of the term "Energy" and the unit kilojoule (kJ) will better promote the concept of energy in food than the current sole use of "Calories" does.

We would point out that Australia and New Zealand already use kJ in preference to Calories.

UKMA July 23rd 2012