Food Labelling

Report from a Nordic Seminar, Oslo, Norway, November 2006

TemaNord 2006:601
Nordic co-operation

Nordic co-operation, one of the oldest and most wide-ranging regional partnerships in the world, involves Denmark, Finland, Iceland, Norway, Sweden, the Faroe Islands, Greenland and Åland. Co-operation reinforces the sense of Nordic community while respecting national differences and similarities, makes it possible to uphold Nordic interests in the world at large and promotes positive relations between neighbouring peoples.

Co-operation was formalised in 1952 when the Nordic Council was set up as a forum for parliamentarians and governments. The Helsinki Treaty of 1962 has formed the framework for Nordic partnership ever since. The Nordic Council of Ministers was set up in 1971 as the formal forum for co-operation between the governments of the Nordic countries and the political leadership of the autonomous areas, i.e. the Faroe Islands, Greenland and Åland.
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Preface

The Nordic countries have a long history of working together on food labelling. This cooperation, which has been formalised under the Nordic Council of Ministers and the Committee of Senior Officials for Food Issues, has led to a number of important projects being carried out.

The current EU food labelling legislation has to be revised according to the DG SANCO Consultative Document of February 2006. This document encourages member states to come with their responses to some food labelling issues. Indeed, this was the point of departure for the Nordic seminar on food labelling, held 20-21 November 2006 in Norway. Both Nordic policymakers and stakeholders were invited so they could get input from presentations, discuss food labelling and comment on the consultative document.

Norway currently holds the presidency of the Nordic Council of Ministers in 2006 and has overall responsibility for this project. Anita Utheim Nesbakken, Norway, was project director. Gunn-Turid Kvam, at the Centre for Rural Research, has helped write up the report.

All five Nordic countries were present at the seminar. The following participants from each country are responsible for this report:

- Birgitta Lund, National Food Administration, Sweden
- Tytti Itkonen, Finnish Food Safety Authority Evira, Finland
- Lars Aslo-Petersen, Danish Veterinary and Food Administration
- Jonina Stefansdottir, Environment and Food Agency of Iceland
- Anita Utheim Nesbakken, Norwegian Food Safety Authority

Comments from stakeholders and policymakers who participated in the Nordic workshop are also presented in this report. Additionally, comments from consumer studies conducted in the Nordic countries have been included.

Nordic work on food labelling will continue. One ambition is for the Nordic countries to develop some further common comments on some of the themes on which the revision focuses.

This seminar was supported by the Nordic Council of Ministers and the Nordic Committee of Senior Officials for Food Issues.
Summary

This report provides a summary of the comments from the workshop and the results of some consumer studies presented at the Nordic Seminar on Food Labelling 20 – 21 November 2006. The reason for arranging the seminar was to hear comments on food labelling from different stakeholder groups, summarise Nordic consumer studies on food labelling and, based on this, develop common Nordic themes and preferences on some issues. This report will be forwarded to the European Commission as comments to the current revision of the food labelling legislation.

On the first day of the seminar consumer representatives, representatives from trade and industry and policymakers from the Nordic countries were present. Different aspects of food labelling were addressed in presentations to the plenary sessions. The participants were then divided into 4 groups to discuss aspects of food labelling. One group consisted of consumer representatives, one of representatives from the industry, one of industry and trade and finally one of policymakers. The discussions were based on questions structured according to the DG SANCO Consultative Document of February 2006. The groups had to prioritize the five most important issues to discuss during the workshop, which means that only some issues were commented on by each group. The results of the workshops were then summarised at a plenary session at the end of day one.

The second day only involved policymakers from the Nordic countries. The representatives discussed further the issues from day one, both input from the seminar and the workshop, and then identified some common Nordic themes. Some of the themes are commented on in this report while others will have to be discussed additionally before any further comment if necessary can be made.

The report provides comments on the following issues in labelling legislation:

- Common Themes
  - Structure, scope and presentation of labels
- General Food Labelling (in today’s legislation directive 2000/13/EC)
- Nutritional Labelling
- Other Food Issues
  - Origin labelling, ingredients list on alcoholic beverages, GMO labelling and ethical labelling of food.

The comments have been divided into three categories depending on the source. One category of comments is from stakeholders. The second
category includes comments from Nordic policymakers and the third category of comments is based on consumer studies.

Finally, comments from stakeholder groups on some general questions within food labelling are listed. These questions were introductory questions with which to help form the groups and begin discussing the topics.

The programme for the seminar, summaries from the presentations given on the first day of the seminar, the questionnaire for the workshop and a list of participants have been included as appendices to this report.
1. Introduction

The European Commission has started a review of the labelling legislation to make it simpler and more up to date. This seminar was designed to discuss themes in the DG SANCO Consultative Document of February 2006. This report provides a summary of the discussions from the workshop and results from some consumer studies on food labelling. It will be forwarded to the European Commission as a contribution to the current revision of the food labelling legislation.

On the first day of the workshop, consumer representatives, enterprises, policymakers and other stakeholders from the Nordic countries were present (appendix 1, Programme for the Nordic Seminar on Food Labelling). Different aspects of food labelling were addressed in presentations to the plenary sessions (appendix 2, summaries of presentations). After the plenary session the participants were divided into 4 groups to discuss aspects of food labelling. One group consisted of consumer representatives, the second of representatives from industry, the third of industry and trade representatives and the fourth of policymakers (appendix 3, participants at the workshop). The discussions were based on questions structured according to the DG SANCO Consultative Document of February 2006 (appendix 4, questionnaire). The groups had to prioritize the five most important issues to discuss during the workshop, which means that only some issues have been commented on by each group. The results of the workshops were then summarised at a plenary session at the end of day one.

The second day was restricted to policymakers from the Nordic countries. The representatives summed up day one, both the input from the seminar and the workshops, and then identified some common Nordic themes. Some of the themes are commented on in this report while others will have to be discussed additionally before any more comments if necessary can be made.

In this report, comments have been divided into three categories: from stakeholders, from policymakers (“comments from Nordic countries”), and from consumer studies in the Nordic countries. The structure of the report follows that of the Consultative Document.
2. Common Themes

Chapter two, Common Themes, has been divided into three headings, Structure, Scope and Presentation of Labels.

2.1 Structure

Comments from stakeholders:
All stakeholder groups prefer regulation. They believe regulation is preferable as it will contribute to harmonization and ease the free flow of goods between countries. Regulation will ensure the same information on products and make it easier for consumers to compare them. One disadvantage might be that it will take some time to reach agreement on the regulation.

Comments from Nordic Countries:
The Nordic Countries would as far as possible prefer one piece of legislation encompassing labelling rules. Efforts should be made to make the various labelling rules and wordings in the various legal acts consistent and uniform. In the future, it is important to avoid facing the same chaotic situation as exists today, with inconsistent labelling rules scattered over a number of directives and regulations. One way forward might be to consult the labelling expert group before any change to all legislation to do with labelling is adopted.

The Nordic countries would prefer a regulation and not a directive to ensure measures are adopted at the same time and in the same way throughout Europe. The advantage of this suggestion would be harmonisation, the same rules for all countries involved and implementation of the rules at the same time. The disadvantages might be that one loses flexibility. It will therefore be important to find a way to solve these potential problems.
2.2 Scope

Comments from stakeholders:

Stakeholders propose having a transitional period for SME’s to adjust because small firms usually need some time to adapt to new rules.

Stakeholders agree that information on foodstuffs is equally relevant even if the foodstuffs are not pre-packaged. The fact that an increasing proportion of people eat out and buy ready meals makes labelling on non-prepackaged foodstuffs important. According to the consumers’ working group, having a list of ingredients is most important but information about nutritional content is also important for non-prepackaged foodstuffs. They believe that this labelling is important, especially from a health perspective and as far as safer food is concerned.

One disadvantage of this is the extra work and expenses involved for food shops that have to present customers the required information in the shop. One challenge mentioned by stakeholders in connection with introducing labelling on non-prepackaged food is the skills of the people responsible for providing the information in stores. Industry and trade representatives propose focusing on pre-packaged foodstuffs initially to improve labelling before focusing on non-prepackaged foodstuffs.

Comments from the Nordic Countries:

The Nordic countries believe that the list of ingredients should be mandatory on all foodstuffs (also on alcoholic beverages). The same rules should preferably be applicable to all (including SME’s). Efforts should be made to minimise problems regarding changes in labelling rules. One way forward might be to establish a long transitional period in which to adapt to any new measures. Fixed dates for entering into force for all changes to the labelling rules should also be assigned.

The Nordic countries would prefer to retain all the mandatory rules on pre-packaged foodstuffs. Non-prepackaged foodstuffs should also be within the scope of this regulation. It is important to keep in mind that consumers have the right to know.

2.3 Presentation of labels (size, format, logos or symbols)

Comments from stakeholders:

Stakeholders agree that standardisation of the presentation of labels is preferable. They believe that there should be regulation of font size and contrast to make the information readable. Also, the language used has to be understandable. According to the consumer group, a logo is not pref-
erable but they would like a health symbol. The industry & trade group emphasises positive labelling. Speaking about nutritional labelling, this group also suggested that the “big 4” should be on the front of the package and the “big 8”\(^1\) on the back.

According to the consumer group, standardisation of size and format and the use of a health symbol could help consumers find information, increase clarity and make it easier to educate consumers. Another benefit of these proposals is that consumers would be given the possibility to make faster and simpler choices. It would be easier to compare products, and more people might read the labels. The consumer group believes that consumption may then go in a healthier direction. These proposals may have repercussions on how many languages labelling may contain, but a reduction in the number of different languages would be regarded as a positive change from the consumer group’s point of view.

The industry group suggests having a close dialogue with the industry sector and consumers on this issue. The industry can provide useful consumer data from consumer surveys and consumer telephone calls. It is important to gather information from consumers who are not satisfied with today’s system. It is also important to bear in mind that the different sizes and shapes of a product may make labelling challenging. Some products may for example need a linear presentation because of the shape. Tough competition is another aspect which makes marketing important for producers.

*Comments from Nordic Countries:*

The Nordic countries believe there should be regulations with minimum requirements for the presentation of labelling (e.g. font size). There should be additional guidelines on the other aspects. Symbols and logos should not replace text that is mandatory today. The use of symbols and logos as additional information could be discussed.

*Consumer study:*

A newly completed Nordic consumer study is in keeping with the results from the workshop. The introduction of regulations related to a minimum font size in order to facilitate legibility is a popular idea with consumers in all five Nordic countries. Consumers also appreciate the idea that compulsory labelling information should always be laid out in the same format on all packages. Consumers are not that interested in the proposal to replace consumer information in textual form with new types of pictures and symbols (Synovate 2006).

\(^1\) The big 4 consists of: protein, carbohydrates, fat and energy value. The big 8 includes the big 4 plus saturated fat, fibre, sugars and sodium/salt plus transfats, according to the industry & trade group.
3. General Food Labelling
(in today’s legislation)

Comments from stakeholders:
According to the consumer group all ingredients should always be declared, including spices. This benefits the consumers and is of particular importance to allergy sufferers. However, this suggestion may cause difficulties for producers.

Comments from Nordic Countries:
The Nordic countries believe that all existing mandatory information should be kept on the labelling. The reason for this is that the existing mandatory information is basic product information which is well established and consistent with international standards. The information that is mandatory today is necessary both before purchase and also when the food is used. Even if new technology provides new possibilities for providing information about foodstuffs, not everyone has access to this technology. The technology may not be available at all stages when the information is needed.

Consumer studies:
Various consumer studies have looked at aspects of today’s labelling. According to two different studies, consumers prefer the list of ingredients to be complete and include all ingredients, and state each and every ingredient as a percentage of the total product (TemaNord 2001:573) (TemaNord 2002:589). The amount of significant ingredients should be stated including ingredients present in significant quantities, ingredients consumers associate with the food and ingredients emphasised in the labelling on the packaging (TemaNord 2002:589).

Another result is that the date of production should be mandatory, not just the shelf life (TemaNord 2001:573). Foods ought to be labelled with both use-by-dates & production or initiation dates to give consumers an opportunity to judge a product’s freshness and other qualities relating to the product’s age (TemaNord 2002:589).

The consumers want the authorities to make strict rules and perform thorough supervision of the use of additives and preservatives (TemaNord 2001:573). They also agree that communicating the risk associated with using additives should be improved (TemaNord 2002:589).
Nordic consumers agree that information about the "best before date” and ingredients must be printed clearly on the food packaging (Synovate 2006).
4. Nutritional labelling

Comments from stakeholders:

Both the consumer group and the industry group proposed that the declaration of the big 8 should be mandatory. The consumer group proposed signposting on the front of the pack and that there should be common criteria throughout the EU. This is important because of health aspects. The industry group proposed that labelling the content of energy should be voluntary and that a branch standard should be developed. Further, they proposed that the concept of GDA (Guideline Daily Amount) should be evaluated. They refer to guidelines from the CIAA (Confédération des Industries Agro-Alimentaires de l’UE). There should not be an emphasis on the adverse effects of the food on the label, but the consumers themselves must have the ability to evaluate the foodstuffs. There might be a problem with space on some products. Some products are not suitable for nutritional labelling (e.g. fat content in coffee). Sign posting should focus on nutritional declarations. According to the industry, nutrition is the biggest challenge to the food industry. The industry & trade group stressed that nutritional labelling should not be too detailed.

Consumer studies:

Results from consumer studies show that consumers want nutritional declarations to be mandatory on all pre-packaged foods (TemaNord 2001:573; 2002:589; 2004:508). Nutritional information should consist of the following mandatory list; energy, fat (of which hard fat), carbohydrates (of which sugars), fibre, protein, salt (TemaNord 2004:508). According to consumer studies, authorities and experts should inform consumers which foods are "healthy" and nutritionally appropriate (TemaNord 2001:573). There is generally little understanding of nutritional labelling among consumers. Nutritional labels should be standardised and the text should be legible (TemaNord 2004:508). The format of nutritional information should be mandatory and give information per 100 g, per portion and a simple guidance system should be tested (RDI is too complicated) (TemaNord 2004:508).
5. Other Food Issues

Chapter five, Other Food Issues, is divided into five headings; Origin Labelling, Ingredients list on alcoholic beverages, GMO Labelling, Ethical Labelling and Health Labelling.

5.1 Origin labelling

Comments from stakeholders:
The consumer group wants mandatory labelling of origin. This is important for consumers as they want the right to choose based on animal welfare concerns, environmental questions, and the quality and safety of food.

Comments from Nordic Countries:
The Nordic countries propose focusing on preventing consumer from being misled. Criteria should be formulated for the use of different terms concerning origin e.g. “Manufactured/Produced in …. (country)”, or “Country of origin: X”.

Consumer studies:
According to consumer studies, the country of origin should be mandatory (TemaNord 2001:573; 2002:589). Information about country of origin must be printed clearly on the food packaging (Synovate 2006). Regarding existing labelling of origin, the Nordic survey from 2006 shows that consumers are discontent with the current labelling that does not inform them about the origin of primary ingredients in food products. The results from the open-ended question about how country of origin should be shown on food packages shows that consumers in general do not have a sophisticated opinion about how labelling functions today. It is, however, clear that information about origin is very important to consumers, although many consumers do not know the difference between different types of origin labelling. A substantial proportion of consumers also comment on the need for clearly printed information that is easy to read.
5.2 Ingredients list on alcoholic beverages

*Comments from Nordic Countries:*

The Nordic countries believe that there is no reason to differentiate between alcoholic and non-alcoholic beverages. The list of ingredients should be mandatory on all foodstuffs.

5.3 GMO labelling

*Consumer studies:*

Results from consumer studies show that foods and ingredients which contain or consist of genetically modified organisms (GMO’s), or are produced using GMO’s, should be labelled (TemaNord 2002:589).

5.4 Ethical labelling

*Consumer studies:*

Consumer studies show that consumers want ethical and environmental values in food production to be credited. How consumers might best be informed of these values needs to be clarified (TemaNord 2002:589). In a report from 2004, some proposals for joint Nordic initiatives were made to promote consumer information about ethical conditions in food production (ANP 2004:741):

- Development of informational and educational methods on ethics in food
- Analysis of the economic consequences of the use of different methods with which to inform about ethical conditions in food production
- Nordic guidelines for the use of ethical claims in marketing
- Labelling of fish from sustainable fisheries
- Nordic database on sustainable production
- Methods for assessing the environmental impact of food
- Development of criteria and labelling for animal welfare in cooperation with the food industry.
6. Additional comments from workshop discussion

The stakeholders also answered three more questions about food labelling in their group discussion. These questions were the opening and introductory questions to help shape the groups and begin discussing the topics. The comments below are keywords from the different group presentations.

The first question was:
1. What characterizes the perfect food label?

Comments from the consumer group:
- Allergen always has to be labelled
- List of ingredients has to be complete
- The language has to be understandable and readable. The legislation of today demands this, but there are still many problems
- Factors related to health have to be labelled
- Nutrients have to be declared (the big 8)
- Nutrition symbol
- Best before date should be labelled
- Date of production and date of packaging is preferred
- Price (per unit and per litre/kg)
- If the product is organic, this has to be labelled
- Country of origin for raw material should be labelled when sold as such

Comments from the industry group:
- It should be legible
- Often many languages
- Ingredients list must be readable
- It should be understandable
- Depends on level of consumer knowledge
- Government is responsible for educating consumers
- E numbers vs. full chemical name to provide more “room”. Functional names could be dropped.
- Standardisation of where information is located on the pack
- Standardisation of “best practice” regarding nutritional information
Comments from industry & trade group:
- Clear and understandable information
- Not too much information
- Difference between need to know and nice to know. Focus on what information consumers need
- One common symbol labelling
- Readable

The second question to be answered was:
2. The food label is only one way of providing information. Try to develop a list of additional means that could be used to pass on information from the seller to the consumers?

Content from the consumer group:
- It is important that information may be found in the shop
- Use of calculator
- There might be a code on the product for different kinds of information
- To minimise the number of languages, it should be possible to get information by using SMS
- Internet is a possible source of information
- Booklets and brochures are an alternative

The industry group mentioned:
- Internet
- Telephone
- Brochures
- Scanning in shops to provide information
- Micro chips provide more information (also useful for ethnic groups within a country)

Comments from the industry & trade group:
- Scanning in store
- Advertising
- Web/consumer information
- Leaflets
- Hotline to help guide consumers
- Coordinate with education & health department (fruit for schools/health stations etc.)

Consumer studies:

Results from studies suggest that experiments with electronic product labelling should be initiated in shops and on the internet in cooperation
with the food industry, commerce, public officials and interest groups (TemaNord 2002:589).

The third question was:
3. Make a list of keywords what comes to mind when you think of today’s labelling?

Results from consumer’s group:
- The information is difficult to understand for a lot of people
- Quite often too small fonts are used and because of bad contrast it is difficult to read labels
- The labelling is inadequate
- The information is sometimes misleading
- Information about “traces of nuts” is worthless and misleading
- Too many foreign words are used
- The use of the keyhole symbol is good

Results from industry group:
- There is plenty of good information available today. The information is very comprehensive
- Being able to understand labelling is very dependant on education
- Labelling is non-consumer friendly. It is often too complicated because consumers do not have enough background knowledge

Results from industry & trade group:
- Technical information
- Lack of basic knowledge
- Size of letters and size of information
- Difficult to read
References


Synovate (2006), Presentation on The Nordic Seminar on Food Labelling 20–21 November 2006, Norway. Appendix 2, overhead Presentation of Survey on Nordic Consumers Attitude to Food Labelling

Nordisk Ministerråd (2004), Ethical labelling of food. ANP 2004:741

Links to other Nordic reports concerning labelling referred to at the seminar:


Sammendrag


På seminarets andre dag var det kun representanter fra de nordiske myndighetene tilstede. Spørsmålene fra den første dagen ble diskutert videre, og på bakgrunn av innspill og inntrykk fra den foregående dagen ble det identifisert noen felles nordiske temaer. Noen av disse er kommentert i denne rapporten, mens andre må diskuteres videre før eventuelt flere innspill kan gis.

Rapporten kommenterer følgende aspekter ved merkeregelverket:

- Generelle temaer
  - Lovstruktur, gyldighetsområdet og hvordan merkingen presenteres.
  - Generell merking (i dagens regelverk, direktiv 2000/13/EC)
  - Næringsdeklarasjon
  - Andre temaer
    - Opprinnelsesmerking, ingrediensliste på alkoholholdige drikkevarer, merking av GMO og etisk merking.

Kommentarene er delt i tre kategorier: kommentarer fra interessentgrupper, kommentarer fra nordiske myndigheter og kommentarer basert på resultater fra forbrukerstudier.
Til slutt er det listet opp kommentarer fra interessentgruppene på spørsmål om merking av mat. Disse spørsmålene var introduksjons-
spørsmål til gruppediskusjonen med det som formål å forme gruppene og rette fokus for diskusjonen mot temaet merking.

Programmet for seminaret, sammendrag av foredragene, spørreguiden for arbeidsgruppene og deltakerliste ligger som vedlegg til rapporten.
Appendix 1: Programme Nordic Seminar on Food Labelling
PROGRAMME NORDIC SEMINAR ON FOOD LABELLING

Clarion Hotel, Oslo Airport: 20 - 21 November 2006

By the Norwegian Food Safety Authority

Supported by the Nordic Council of Ministers

Monday 20. November
Chair: Kari Bryhni

09.30 Coffee and registration

10.00 Welcome and introduction
Joakim Lystad, Director General, Norwegian Food Safety Authority

10.15 Labelling in the EU and the frame for the new legislation
Michael Wight, Head of Division, Consumer Choice, Food Standards and Special Projects Division, Food Standards Agency, UK.

11.00 Coffee-Break

11.15 Previous Nordic studies on food labelling
There have been several studies on food labelling in the Nordic countries. This presentation gives a general overview of this work.
Ms Lena Janson, Chief Government Inspector
Swedish Food Administration

11.45 Nordic consumer studies on food labelling spring 2006
The Swedish Food Administration has performed an opinion poll on Nordic consumers’ needs, requirements and priorities. The aim has been to document background information for the current revision of the EC labelling directive. David Ahlin and Lena Hammers, Synovate Sweden AB.

12.30 Lunch

13.30 Stakeholders’ views on food labelling
Ellen Bjørkum, Consumer Council of Norway
Discussion

14.15  Workshop
The participants will be divided into groups for discussion.
Coffee during group discussions

16.00  Plenary session and summary of the discussions
Interactive discussion

17.30  End of day one

20.00  Dinner (representatives from the Nordic Food Authorities)

Tuesday 21 November
This day is restricted only to representatives from the Nordic Food Authorities. The representatives will sum-up day one and identify common Nordic themes. The results will be presented in a report and forwarded to the European Commission.
Appendix 2: Summary of presentations
Welcome and introduction

By Joakim Lystad, Director General, Norwegian Food Safety Authority

LADIES AND GENTLEMEN, DEAR COLLEAGUES!
VELKOMMEN! TERVELOA! VELKOMIN! VÄLKOMMEN! VELKOMMEN! WELCOME!

On behalf of the Norwegian Food Safety Authority I would like to welcome you all to this Nordic seminar on food labelling - which will be held in English since we have guests from outside the Nordic countries.

Today we are very lucky to have representatives from the consumers, industry, retailers and authorities gathered here at Gardermoen.

This seminar is supported by the Nordic Council of Ministers and the Nordic Committee of Senior Officials for Food Issues. The presidency of the Council of Ministers, which is held for a period of one year, rotates between the five Nordic countries (Iceland, Finland, Sweden, Denmark and Norway). Norway has the presidency of the Council of Ministers in 2006. Close co-operation for better food labelling is part of the programme for the Norwegian presidency.

Nordic co-operation is one of the oldest and most extensive regional partnerships in the world. The Nordic Council was founded as a forum for members of parliaments and governments in 1952. The Helsinki Treaty of 1962 formed the framework for Nordic co-operation. The Nordic Council of Ministers was formed in 1971 and is the forum for Nordic governmental co-operation. Co-operation facilitates the promotion of Nordic interests in the world at large and helps retain positive relations between our neighbouring countries.

Overall responsibility for the Nordic Council of Ministers lies with the respective Prime Ministers. In practice, responsibility is delegated to the Ministers for Nordic Co-operation (MR-SAM) and to the Nordic Committee for Co-operation (NSK), which co-ordinates the day-to-day work of the official political Nordic co-operation. Issues are prepared and followed up by the various Committees of Senior Officials (ÅK or EK) which consist of civil servants from the member countries.

The Nordic countries have a long history of working together on the issue of food labelling. This includes the Nordic network on
Food Labelling, which meets every year to discuss issues and exchange views and knowledge about food labelling. Many Nordic Studies have also been conducted to explore consumer preferences and other issues important within Food Labelling. Ad hoc working groups may be set up when an issue arises on which the Nordic countries might have common views and can benefit from cooperation.

The Norwegian Food Safety Authority hopes this food labelling seminar will be an important contribution to the ongoing process of revising the Food Labelling regulations. Even though the process is in progress and comments on the Commission’s consultative document were forwarded in June, we find it important to make sure that we have a dialogue throughout the process. To make sure that our decisions are founded on extensive and meaningful dialogue with the community and that decisions made are based on a thorough acquaintance with important stakeholders’ views.

We hope this seminar will lead to knowledge and ideas, conceptions and objections, warnings and advises, reflections and inspirations to the people that are going to carry further the work of the revisions of the labelling legislations.

We hope it will contribute to the development of a useful and usable legislation that, in a wise manner, takes care of the consumers needs and at the same time is possible for the industry and retailers to live up to.

As an introduction to this seminar we think it’s appropriate to explain the background and the aim of revising the food labelling regulations. To provide a more complete perspective at this seminar we have invited keynote speaker from the Food Standard Agency in UK. UK and the Netherlands have earlier this year arranged a similar conference on food labelling in Rotterdam, and UK has been highly involved in the work going on in the EU in the area of food labelling. After the presentation there will be a debate. A report will be made and hopefully this will be a useful document in future work on the revision of the food labelling legislation.

I hope you will have an interesting and useful seminar and fruitful discussions.
EU Food Labelling Review

By Michael Wight, Head of Labelling, Standards and Allergy Division, Food Standards Agency, UK.

Labelling Legislation

EC legislation requires that information on labels is easily visible, clearly legible and indelible. It also requires a number of mandatory declarations for pre-packed products that have developed over many years to meet consumer demands and protect public health. Other voluntary information may be provided as long as it is accurate and not misleading, but there is no obligation that this should be on the label\(^2\). Foods sold loose or pre-packed for direct sale are largely exempt from mandatory requirements, to allow flexibility for small businesses and Member States may set out their own provisions in this regard.

The majority of the main EU food labelling requirements date back to 1979. Although there was a consolidation in 2000 (set out in EC Directive 2000/13), there have subsequently been a significant number of detailed amendments. Additional labelling requirements are contained in some 40 horizontal and vertical pieces of legislation. This makes it difficult for businesses and enforcers to identify requirements for individual products.

In the UK, like other Member States, responsibility for these requirements is spread across a number of Government Departments. Similarly, different Directorate Generals within the European Commission are responsible for legislation containing labelling rules.

The Review

The European Commission announced a review of labelling legislation in 2004, and published a consultation document\(^3\) in February 2006. This sought views on issues such as scope and presentation of legislation, how information might be presented, different regulatory options as well as on specific issues such as country of origin labelling. This was subject to a public consultation in the UK, and the Government’s response setting out

\(^2\) other than in the case of nutrition labelling where a claim will invoke required labelling declarations.

\(^3\) http://europa.eu.int/comm/food/food/labellingnutrition/betterregulation/index_en.htm
initial comments was sent to the Commission on 5 July\(^4\). The Commission is now looking at responses from Member States and a wide range of other stakeholders. We expect a formal proposal from the Commission towards the end of 2007.

In the UK, we consider the EU review provides an opportunity to take a fresh look and prepare a ‘future-proof’ labelling and information strategic platform that anticipates the needs of consumers, rather than a short term approach that will need reviewed again in a few years’ time.

**Discussion**

Consumers’ choices and purchasing decisions are influenced by an increasingly sophisticated range of information. Individual consumers will also have their own set of values that they think about when purchasing food, so their particular information requirements often reflect these.

Generally, consumers have become accustomed to the wide range of information primarily, although not exclusively, available through a paper label on products. There is common agreement amongst consumer, industry and enforcement bodies that labels need to be clear. Part of the difficulty is that food labelling rules have evolved piecemeal in response to a variety of issues and consumer demands.

At the same time the preponderance of more complex/ready to eat foods and food traded by multinationals within the European Community Single Market bearing multi-language labels may have contributed to crowded labels resulting in a loss of clarity for the consumer.

The key issues, for the consumer, are therefore simplification of the label and clarity and accessibility to the necessary information to make an informed choice.

**Provision of Information versus Labelling of Products**

Looking at labelling from a *strategic* viewpoint - a distinction could be made between the provision of information that can be easily accessed by the consumer and the *labelling of products*. This would mean an acceptance that perhaps the label is not necessarily the only route for providing consumer information. Some key questions to ask are:

\(^4\) [http://www.food.gov.uk/multimedia/pdfs/labelresponsetoeu0607.pdf](http://www.food.gov.uk/multimedia/pdfs/labelresponsetoeu0607.pdf)
What information is required by consumers to inform their purchasing decisions?

Does it need to be on the label or could it be provided elsewhere, other than on the label, and how? Could we make use of new technologies?

What information is essential to appear on the label, and how should this be decided? For example, by perhaps establishing framework principles for the provision of information particularly in relation to relating to safety and health.

In considering these questions, however, we need to be bear in mind a number of points.

Consumers vary in their use of the label. Not all consumers are the same, of course. Some wish a full range of information whilst others are only interested in particular issues. Some consumers will make use of specific pieces of information on every purchase, whilst others will make use of this on first purchase only or when the product seems to have changed from their customary purchase. Furthermore, a label is an integral part of product marketing and ‘cleaning up’ the label could affect the industry’s ability to attract consumers to their products. It should also be noted that labelling legislation provides exemptions for the labelling of loose foods and foods pre-packed for direct sale, including catering establishments.

**Labelling Clarity**

In terms of labelling clarity, both consumer research and stakeholder meetings have indicated that presentation is one of the most important issues to consumers. This is not just a matter of print size alone - format, colour, contrast, information groupings and standardisation are also important. This issue was addressed in stakeholder workshops held in the Netherlands and London, earlier this year. Ideas for possible pan EU solutions such as grouping mandatory information in a box, prescribed print sizes or standard formats were considered. The view of those present was, however, that prescription reduced flexibility in positioning of information and was not applicable across the broad range of food products and packaging.

However, if one looks at the current level of voluntary/marketing information and its prominence in regard to the mandatory declarations there may be a case for considering some form of prescription. Indeed, there are some indications that on some products mandatory information accounts for a relatively small percentage of the space on a label.
Non-Regulatory Approaches and Applicability at the EU Level

Rather than legislation, the option of non regulatory approaches could be considered. In addition to our domestic guidance on regulatory requirements, the UK already has ‘Best Practice’ guidance in a number of areas\(^5\). The advantage of this Guidance is that it is more responsive than legislation and encourages the adoption of a common approach without placing regulatory burdens on food businesses. The disadvantage is that voluntary guidance may be followed by some but not others. Of course, parts of industry prefers self-regulation whilst consumer groups generally prefer the prescriptive clarity of legislation.

Pan - European guidance in some areas may be feasible – for example, in the difficult areas of label presentation and formats and such guidance might not necessarily be Government sponsored but EU wide industry codes. Again, this may find favour in some camps but not others.

Benefits and Risks

Providing a European approach could be agreed, simplification of the label could benefit consumers. Depending on what legislation or approaches emerged, those who required additional information to inform their purchasing choice might need to become accustomed to finding that information elsewhere.

A lot of consumer research has been done in the area of consumer demands for information and a potential downside is that consumer groups may see any reduction of information on the label as a loss of hard-won battles achieved over the years. This may depend on where that information is available. Previous indications have been that encouragement of ‘off-label’ provisions might not find favour with consumers. The general view of consumer groups is that consumers generally wish all the information they deem desirable (including voluntary indications) to be easily available in one place at point of purchase.

For industry, bringing together all the horizontal legislation into one legislative act would aid accessibility to the regulatory requirements. Again, depending on the outcome, e.g. easing of some statutory requirements, such as double labelling or moves to Codes of Practice, industry may also benefit from reduced printing and packaging costs and would be more adaptable to labelling changes.

\(^5\) Clear Food Labelling; Country of Origin Labelling; Criteria for the use of the Terms ‘Fresh, Pure and Natural etc’; Use of the terms Vegetarian and Vegan; Allergens – ‘May Contain’ labelling; Allergens – Labelling of non pre-packed foods (out to consultation)
There may also be an impact on marketing and the ability for producers and retailers to differentiate their products from others. It has to be acknowledged that much of the non-statutory labelling relates to marketing that would encompass a host of assurance labels governing ethical or other issues deemed important by some consumers. The ability of small and medium sized enterprises to absorb or meet change is also an important factor.

If there is any move to greater ‘off-label’ provision there may be an additional cost in terms of display material or information provision. In assessing ‘off-label’ approaches, consideration needs to be given to the use of new technologies, which are available but at present are somewhat limited in what they can deliver at point of purchase. This situation is likely to change rapidly within the near future given the innovation in the area - so the impact of new technology should not be underestimated. It will be important that any future labelling framework does not prejudice through legislation the development or uptake of these technological approaches.

Finally, care will also have to be taken that existing measures that provide real benefit are not lost and that full account is taken of the views of consumer, industry and enforcement interests.

**Next Steps in UK**

So where are we in the UK? A great deal of work has already been undertaken in the UK on food labelling since 2000 when we launched a ‘Better Labelling Initiative’. A number of measures contained in what we called our ‘Food Labelling Action Plan’, such as full ingredient listing; allergen labelling; GM labelling; and nutrition labelling, have already been adopted or are being discussed in Brussels. Others, such as origin labelling, are reflected in the EU labelling discussion document. We also introduced our guidance - which I referred to earlier as a result of this initiative.

In the context of the EU review we recently sought the views of the Food Standard Agency’s Board on a number of issues. These were:

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6 Internet and customer care lines provide access to information but these may only be able to meet consumer demands for supplementary information, will not encompass all socio-economic groups and may disadvantage SMEs. In terms of technological developments for point of purchase information, some supermarkets have been trialling the use of bar codes and readers to provide more information ‘off label’. New technology, involving mobile phones to read new types of bar codes have been trialled but such technology is some way in the future.
• The current and future information needs of consumers and how this can best be provided.

• Whether all the current information required under current EU labelling requirements should still be on the label of a food or provided in some other way and whether a set of principles governing what must appear on the label could be established – we are currently undertaking this exercise.

• How other information might be provided (either on a mandatory or voluntary basis) and whether the Agency could investigate available ‘off-label’ approaches to assess the potential for greater use of other media to deliver consumer information at point of purchase (or elsewhere).

• Whether it is appropriate to ask the European Commission to consider whether pan-European guidance in some areas is feasible.

Our Board concluded that:

• Agency officials propose a set of priorities based around safety and nutrition criteria;
• commission consumer research to establish real consumer behaviour
• consider how future IT developments might provide access to info by consumers
• take the opportunity to reduce burdens on industry and clarify the labelling provisions

We are now undertaking a literature review of consumer and labelling studies. This might identify any gaps in our knowledge or areas where further studies might be useful. We will keep the European Commission informed as our work progresses in these areas.

So where is the European Commission?

There has recently been one expert working group in Brussels at which many countries reiterated positions set out in their consultation responses. Like the UK, some wish a long term strategic approach whilst others are looking at current rules with the aim of simplification and or clarification.

The European Commission will be convening a number of these expert meetings in the New Year to take this forward. Based on responses so far, the Commission is now thinking of different options but has said it is open to new approaches. So, if a country wishes to take things in a differ-
ent or new direction, it will need solid proposals or ideas – that is, of course, the difficult part when there are so many opinions and opposing viewpoints. So, certainly a challenge - but also an opportunity!
Previous Nordic Studies on Food Labelling

by Lena Janson, Chief Government Inspector, Swedish Food Administration

Food labelling in the Nordic countries conforms to EU legislation. Food labelling has been a topic of great importance for the Nordic countries. Under the Nordic council of Ministers and the Committee of senior Officials for Food Issues projects have been carried out since the early 1990s. A study dated 1994 start to give an overview of food labelling in the Nordic countries. This study showed that there were gaps in existing knowledge about what consumers want, need and understand about labelling (Food Labelling TemaNord 1998:577). To fill the gaps the Nordic Council of Ministers started an extensive work on food labelling. This summarizes some of the Nordic studies made in recent years.

A pan-nordic consumer survey was made in 2000 and resulted in the report Food Labelling: Nordic Consumer’s Proposals for Improvements (TemaNord 2001:573). The pan-nordic survey showed that consumers wish that:

- Country of origin should be mandatory (86%).
- Date of production should be mandatory - not just shelf life (81%).
- Nutritional declaration should be mandatory (79%).
- List of ingredients should state each and every ingredient in percentage of total products (58%).
- Inspection and supervision: the authorities should make strict rules and carry out thorough supervision of the use of additives and preservation (86%).
- Health information: the authorities and experts should inform consumers which foods are "healthy" and nutritionally appropriate (63%).

The study mentioned above resulted in the Nordic Policy Towards the Labelling of Foods (TemaNord 2002:589). The following recommendations for the Nordic initiatives stated that:

- Foods should have their country of origin marked ("origin" needs to be defined).
- Foods ought to be labelled with both use by dates & production or initiation dates to give consumers a chance to judge a products freshness and other qualities relating to the products age.
- Nutritional declarations should be mandatory on all pre-packed foods.
- List of ingredients should be complete and include all ingredients. The presence of known ingredients should be stated without
exception. The amount of significant ingredients should be stated including ingredients present in significant quantities/ingredients consumers associate with the food/ingredients emphasised in la-
belling/on the packaging.

- Foods and ingredients which contain or consist of genetically modified organisms (GMOs) or are produced using GMOs should be labelled.
- If health claims labelling of foods is to be allowed, claims should be documented by health science and the consumption of the food in question should have clear health benefits.
- Ethical & environmental values in food production ought to be credited, and how consumers could best be informed of these val-
ues needs to be clarified.
- The communication of risk with use of additives should be im-
proved.
- Simple and accessible models for labelling need to be developed (advantages & possible disadvantages of standardised presentation of labelling information ought to be researched).
- Experimentation with electronic product labelling should be initi-
ated, in shops and on the internet in cooperation with the food in-
dustry, commerce, the public officials and interest organisation.

Following these results a new project group was formed in 2001 to deal with nutrition labelling. Nutrition labelling is an important tool of public health policy. Although indication of nutritional value of a product is optional, unless a nutrition claim is used. The literature review and the formats developed to meet the consumer needs were presented in the report Proposals for New Nutrition Labelling Formats (TemaNord 2002:554).

The project group also was responsible for carrying out consumer tests from which the aim was to formulate recommendations to the Nordic Council of Ministers and possibly a common Nordic Policy on nutrition labelling. A nutrition label is a tool for delivering information and should be supported by educational and other efforts. Nutrition Labelling: Nor-
dic Recommendations Based on Consumer Opinions (TemaNord 2004:508):

- Nutrition labelling should be mandatory on all pre-packed foods.
- There is generally small understanding for nutrition labelling. Nutrition labels should be standardised and the text should be legible.
- Nutrition information should consist of the following mandatory list; energy, fat (of which hard fat), carbohydrates (of which sugars), fibre, protein, salt.
- The formats should be mandatory and should give information per 100 g, per portion and a simple guidance system should be tested (RDI is too complicated).
Consumers must also be guaranteed the possibility of choosing foods on the basis of ethical values. These experiences are described in the report Ethical labelling of foods (ANP 2004:741). The information is often given in text or with a symbol. The initiative for ethical labelling has often been taken by NGOs in order to promote objectives such as sustainable production and fair trade. Existing labelling schemes should be maintained and strengthened within the existing framework. There could be considerable difficulties in introducing a general sustainability label especially for industrial composite foods. The project group sets some concrete proposals for joint Nordic initiatives to promote consumer information on ethical conditions in food production:

- Development of information and educational methods on ethics in food
- Analysis of economic consequences of the use of different methods of informing on ethical conditions in food production.
- Nordic guidelines for the use of ethical claims in marketing
- Labelling of fish from sustainable fisheries
- Nordic data base on sustainable production
- Methods for assessing the environmental impact of food.
- Development of criteria and labelling for animal welfare in cooperation with the food industry.

In accordance with this work a seminar with workshops was also held which is summarized in Seminar – Ethical information about Food (Te-maNord 2004:545)
Survey on Nordic Consumers Attitudes to Food Labelling

By Lena Hammers, Synovate Sweden AB.

Information about "best before date", ingredients and country of origin must be printed clearly on the food package. That is the “top-of-mind” information that Nordic consumers want to see on food labels to be able to make a conscious choice when shopping for food. Out of a list of nine various contents of information on food labels, information on “best before date” comes out on top. Least important to the Nordic consumers is ethical information, e.g. regarding animal welfare and human rights.

The five countries agree about what content of information is the most important. However, information about country of origin is less important to consumers in Norway and in Iceland. The survey also shows that information about nutritional content is more important to consumers in Finland.

The introduction of regulations relating to the minimum print size in order to facilitate legibility is a popular idea with consumers in all five Nordic countries. Consumers also appreciate the idea that compulsory labelling information is always laid out in the same format on all packages.

Consumers are not so interested in the proposal to replace consumer information in text with new types of pictures and symbols. Especially consumers in Norway and Finland have a clearly negative attitude towards the proposal.

Regarding existing labelling of origin, the survey shows that consumers are discontent with current labelling that do not inform about the origin of primary products in food products.

The results from the open-ended question about how country of origin should be shown on food packages shows that consumers in general don’t have a sophisticated opinion about how labelling functions today. It is, however, clear that information about origin is very important to consumers although many consumers do not know the difference between different types of labelling regarding origin. A substantial share of consumers
also comments on the need of clearly printed information that is easy to read.

The purpose of the study is to collect updated information and knowledge on the needs and attitudes of Nordic consumers regarding food labelling.

The survey was conducted at the initiative of the Food Safety Authorities in the Nordic countries and with the support of the Nordic Council of Ministers. The method was 1,000 telephone interviews with a random sample from the general public in each of the Nordic countries. Lena Hammers and David Ahlin at Synovate Sweden conducted the analysis.
Overhead presentation of Survey on Nordic Consumers Attitudes to Food Labelling (Synovate 2006)

Nordic Seminar on Food Labelling
- Consumer Survey in Sweden, Norway, Denmark, Finland and Iceland
Presentation Oslo November 20th

T-113099
Nordic Council of Ministers
Synovate: David Ahlin, Lena Hammers
Date: 2006-11-20

Agenda
- Background of survey
- Method and process
- Subjects and questions

Results:
- Which information is most important to the Nordic consumer?
- What is important in order to locate, read and understand food label information?
- Attitudes towards existing food labelling
- Labelling of origin

Summary
## Background to study on Nordic consumers

- At the initiative of the Swedish Food Safety Authority and the Nordic Council of Ministers, Synovate Temo has conducted a quantitative study on Nordic consumers' attitudes to food labeling. The study was conducted in the five Nordic countries Sweden, Norway, Denmark, Finland and Iceland.
- The survey was carried out under the supervision of a group of representatives from the Nordic Food Safety authorities.
- The purpose of the study is to collect updated information and knowledge on the needs and attitudes of Nordic consumers regarding food labelling. The study aims to contribute with information, knowledge and facts in preparation for the upcoming European Union revision of the food labeling regulations.

## Method and process

- The survey was conducted by telephone interviews in the five Nordic countries.
- The interviews were conducted in the scope of an omnibus survey with the general public in each country.
- More than 1,000 interviews were conducted in each country. A random sample from the general public 16 years and older was taken.
- Interviews were conducted from October 16 to October 26, 2006.
Subjects and questions

- The questions have been written in cooperation between the Nordic Food Safety Authorities and the Research Consultants from Synovate. Both open ended questions and questions with fixed alternatives for answers have been posed to the Nordic consumers.

- Subjects:
  - which information does consumers want to see on food labeling
  - what is the relative importance of different types of information
  - what is it that makes it easy for consumers to locate, read and understand information on food labels
  - attitudes towards ideas on replacing compulsory consumer information, today printed on labels, with new types of pictures or symbols
  - attitudes towards existing labeling regarding the origin of food products
  - the need of information about the origin of the raw material in food products
  - how should origin be labeled on food products

Question 1

Here are a number of questions relating to food, packaging, and information printed on food packaging.

To be able to make a conscious choice when you buy food, which information do you consider must be printed on the package?
### Which information must be printed on the food package?

**Top of mind - Sweden**

<table>
<thead>
<tr>
<th>1. Ingredients, content</th>
<th>6. Ethical information</th>
</tr>
</thead>
<tbody>
<tr>
<td>&quot;Ingredienser är viktigt eftersom jag är diabetiker. Jag är även synskadad och behöver hjälp av andra.&quot;</td>
<td></td>
</tr>
<tr>
<td>&quot;Innehållsdeklarationen, så att man vet vad man dricker i sig när man använder produkten.&quot;</td>
<td></td>
</tr>
<tr>
<td>2. Country of origin</td>
<td>7. That it is a Swedish product</td>
</tr>
<tr>
<td>&quot;Det är viktigt med ursprungslandet, så att man vet varifrån varorna kommer.&quot;</td>
<td></td>
</tr>
<tr>
<td>&quot;Kött ska ha ursprungsland.&quot;</td>
<td></td>
</tr>
<tr>
<td>3. Best-before-this-date</td>
<td>8. Weight</td>
</tr>
<tr>
<td>&quot;Det är viktigt att man vet hur länge det tar för närvarande produktatt underlättad.&quot;</td>
<td></td>
</tr>
<tr>
<td>4. Content of sugar, fat et c</td>
<td></td>
</tr>
<tr>
<td>&quot;Jag tittar gärna på socker, fetthalt och sånt som ingår i varan. Jag vet gärna vad jag dricker i mig - att det inte är en massa kalk eller socker, eller att det inte innebär att det är skadligt.&quot;</td>
<td></td>
</tr>
<tr>
<td>5. Price, price per kilo</td>
<td></td>
</tr>
<tr>
<td>&quot;Priset är intressant och även pris per kilo.&quot;</td>
<td></td>
</tr>
</tbody>
</table>

### Which information must be printed on the food package?

**Top of mind - Norway**

<table>
<thead>
<tr>
<th>1. Ingredients, content</th>
<th>6. Ethical information</th>
</tr>
</thead>
<tbody>
<tr>
<td>&quot;Hva det er, hva det inneholder.&quot;</td>
<td></td>
</tr>
<tr>
<td>&quot;Hva slags ingredienser, allergideklarasjon.&quot;</td>
<td></td>
</tr>
<tr>
<td>2. Best before this date</td>
<td>7. Manufacturer</td>
</tr>
<tr>
<td>&quot;Når den går ut på dato.&quot;</td>
<td></td>
</tr>
<tr>
<td>&quot;Når det er produsert og holdbarhetsdato.&quot;</td>
<td></td>
</tr>
<tr>
<td>3. Content of sugar, fat et ceters</td>
<td>8. Weight</td>
</tr>
<tr>
<td>&quot;Om det er tilsatt mye fett og sukker.&quot;</td>
<td></td>
</tr>
<tr>
<td>&quot;Sukker og fett inneholder, enda mettet og umettet fett.&quot;</td>
<td></td>
</tr>
<tr>
<td>4. Country of origin</td>
<td></td>
</tr>
<tr>
<td>&quot;Hvor produktet er produsert.&quot;</td>
<td></td>
</tr>
<tr>
<td>&quot;Landet det kommer fra.&quot;</td>
<td></td>
</tr>
<tr>
<td>5. Price, price per kilo</td>
<td></td>
</tr>
<tr>
<td>&quot;Hva vare kostet.&quot;</td>
<td></td>
</tr>
</tbody>
</table>
Which information must be printed on the food package?

Top of mind - Denmark

<table>
<thead>
<tr>
<th>1. Best before this date</th>
<th>6. Ethical information</th>
</tr>
</thead>
<tbody>
<tr>
<td>“Hvor gammelt det er.”</td>
<td></td>
</tr>
<tr>
<td>“Salgsdato og produktionsdato.”</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2. Content of sugar, salt, fat et cetera</th>
<th>7. Manufacturer/brand</th>
</tr>
</thead>
<tbody>
<tr>
<td>“Energi og fedtstof og kugleydrater, stoffer, fedttype.”</td>
<td></td>
</tr>
<tr>
<td>“Indhold samt næringsindhold”</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. Ingredients, content</th>
<th>8. Price, price per kilo</th>
</tr>
</thead>
<tbody>
<tr>
<td>“Indhold, hvad det er man køber.”</td>
<td></td>
</tr>
<tr>
<td>“Indhold, deklaration, økologi.”</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>4. Country of origin</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>“Hvor det oprindeligt kommer fra.”</td>
<td></td>
</tr>
<tr>
<td>“Hvilket land det kommer fra.”</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>5. Information about content that could cause allergic reactions</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>“At der står hvad der er i, proteiner, skadestoffer, usundhed.”</td>
<td></td>
</tr>
<tr>
<td>“Mængden af farve- og stoffer”</td>
<td></td>
</tr>
</tbody>
</table>

Top of mind - Finland

<table>
<thead>
<tr>
<th>1. Ingredients, content</th>
<th>6. That it is a Finnish product</th>
</tr>
</thead>
<tbody>
<tr>
<td>“One must know the list of ingredients.”</td>
<td></td>
</tr>
<tr>
<td>“List of ingredients real detailed.”</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2. Content of sugar, fat, salt et cetera</th>
<th>7. Ethical information</th>
</tr>
</thead>
<tbody>
<tr>
<td>“Contents, amount of fat, calories.”</td>
<td></td>
</tr>
<tr>
<td>“Calories and fat and how long it preserves.”</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. Best before this date</th>
<th>8. Weight</th>
</tr>
</thead>
<tbody>
<tr>
<td>“Best before date, and date when the product was manufactured.”</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>4. Country of origin</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>“That depends on product, if it’s meat then I would like to know from what country did it came.”</td>
<td></td>
</tr>
<tr>
<td>“Country of origin that is the most important.”</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>5. Price, price per kilo</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>“Price and weight.”</td>
<td></td>
</tr>
<tr>
<td>“To see good quality and price”</td>
<td></td>
</tr>
</tbody>
</table>

Research done by students
### Which information must be printed on the food package?

**Top of mind - Iceland**

1. **Ingredients/Innehåll**
   - "Correct ingredient listing about everything that is in it."
   - "Precise listing of ingredients like additives and weighing ingredients."

2. **Best-före-datum**
   - "Depends if it is fresh or not, date of production and last day of sale.
   - "First and foremost sell before date and production date."

3. **Innehåll av näringsämnen**
   - "Calories, nutritional values, sugars, fats, additives and all kinds of information."
   - "How much fat, sugar, calories and vitamins there are."

4. **Priktiløp**
   - "If buy a lot for companies, it matters to see the price clearly."

5. **Ursprungsland**
   - "From what country they are."

6. **Etisk information (kravmärkning etc.)**

7. **Tillverkare**

8. **Vikt**

---

### Summary – top of mind – to make a conscious choice which information must be printed on the package?

**Ingredients, content**
- "One must know the list of ingredients."
- "List of ingredients real detailed."

**Content of sugar, fat, salt et cetera**
- "Contents, amount of fat, calories."
- "Calories and fat and how long it preserves."

**Best before this date**
- "Best before date, and date when the product was manufactured."

**Country of origin**
- "From what country they are."
**Question 2**

I will now read out various types of information which can be found on food packaging. How important is it to you that the following information is stated on the package for you to be able to make a conscious choice of a certain kind of food.

*Is it very important, quite important, not so important or not at all important?*

---

**Best before date**

<table>
<thead>
<tr>
<th>Country</th>
<th>Very important</th>
<th>Quite important</th>
<th>Do not know</th>
<th>Not so important</th>
<th>Not at all important</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sweden</td>
<td>89%</td>
<td>10%</td>
<td>1%</td>
<td>1%</td>
<td>0%</td>
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<td>82%</td>
<td>14%</td>
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Research data by Synovate
Information on substances which can cause allergic reactions

The list of ingredients
Nutritional content eg. calories, sugar, fat and salt

![Bar chart showing the percentage of respondents from different countries indicating the importance of nutritional content.](chart1.png)

Ethical information, for example regarding environment, animal welfare and human rights

![Bar chart showing the percentage of respondents from different countries indicating the importance of ethical information.](chart2.png)
Which information is important to be able to make a conscious choice of food?

- "Best before date" is the most important information in all countries
- Ethical information is the least important or among the least important information's to consumers in order to be able to make a conscious choice
- Information on substances that can cause allergic reactions, ingredients and type of food is also considered important by consumers in all countries
- Information about nutritional content is more important to consumers in Finland. Consumers in Finland also feel that information on country of origin is more important
- Information on country of origin is less important to consumers in Norway and Iceland
- Nutritional content, substances that can cause allergic reactions and ethical information is generally more important to women
Question 3

“How important is the following for you to be able to access the information on food packaging?

Would you say that it is…?”

- The introduction of regulations relating to the minimum print size in order to facilitate legibility
- That compulsory labelling information is always laid out with the same format on all packages
- That compulsory labelling information is always printed in the same place on all packages
- Limit the number of authorized languages on packages
The introduction of regulations relating to the minimum print size in order to facilitate legibility

- **Finland**: 52% Very important, 28% Quite important, 14% Do not know, 16% Not so important, 5% Not at all important
- **Sweden**: 43% Very important, 36% Quite important, 15% Do not know, 18% Not so important, 5% Not at all important
- **Denmark**: 41% Very important, 31% Quite important, 16% Do not know, 18% Not so important, 5% Not at all important
- **Norway**: 34% Very important, 30% Quite important, 20% Do not know, 19% Not so important, 6% Not at all important
- **Iceland**: 33% Very important, 41% Quite important, 14% Do not know, 18% Not so important, 6% Not at all important

That compulsory labelling information is always laid out with the same format on all packages

- **Denmark**: 46% Very important, 37% Quite important, 16% Do not know, 12% Not so important, 5% Not at all important
- **Iceland**: 46% Very important, 39% Quite important, 12% Do not know, 12% Not so important, 5% Not at all important
- **Finland**: 36% Very important, 37% Quite important, 19% Do not know, 19% Not so important, 12% Not at all important
- **Sweden**: 34% Very important, 41% Quite important, 19% Do not know, 19% Not so important, 12% Not at all important
- **Norway**: 36% Very important, 39% Quite important, 20% Do not know, 18% Not so important, 6% Not at all important
That compulsory labelling information is always printed in the same place on all packages

Limit the number of authorized languages on packages
How important is the following for you to be able to access the information on food packaging

- The introduction of regulations relating to the minimum print size in order to facilitate legibility is a popular idea with consumers in all five Nordic countries
- Consumers also appreciate the idea that compulsory labeling information is always laid out with the same format on all packages

Question 4
"Today certain types of information are compulsory on food packaging and must be clearly stated, for example, regarding beef, wheat-flour and prawns. A proposal has been put forward which aims to replace this with new types of pictures and symbols instead of printed text in Swedish/Norwegian/ Finnish/Danish/Icelandic.

What is your opinion of this proposal? Do think it is ....?“
Replace compulsory printed information with pictures and symbols

Consumers have an undecided or skeptical attitude towards this proposal.

Consumers in Sweden and Denmark are undecided.
Consumers in Norway and in Finland have a negative attitude.

Iceland is the only country where consumers have a positive attitude to this idea.

It's recommended that this question is further investigated with, for example, the following:
- Explain what symbols mean, what they would look like etc.
- Show what kind of text that would be replaced with symbols.
Question 5

“Certain types of food products are marked with the country in which the finished product is manufactured. However, no information about the country of origin of the raw materials exist.

What is your opinion about that type of marking? Would you say that it is...?
…no information about the country of origin of the raw materials exist…

This is a uniform answer from all the Nordic countries, the majority of the consumers think that it is not good that you do not see what country the content of the product comes from.

Question 6

“How important is it that we know the country which the primary products contented in certain types of food come from. Would you say…?”
The meat in sausage

- Sweden: 71% Very important, 25% Quite important, 3% Do not know
- Finland: 64% Very important, 24% Quite important, 9% Do not know
- Denmark: 62% Very important, 23% Quite important, 8% Do not know
- Norway: 58% Very important, 23% Quite important, 15% Do not know
- Iceland: 56% Very important, 27% Quite important, 14% Do not know

The meat contained in a pizza

- Sweden: 59% Very important, 26% Quite important, 10% Do not know
- Finland: 54% Very important, 27% Quite important, 12% Do not know
- Denmark: 53% Very important, 24% Quite important, 5% Do not know
- Norway: 50% Very important, 23% Quite important, 20% Do not know
- Iceland: 49% Very important, 28% Quite important, 11% Do not know
**Fruit or berries in jams used in the making of cakes**

- **Denmark**: 20% Very important, 24% Quite important, 38% Do not know, 28% Not so important, 15% Not at all important
- **Finland**: 28% Very important, 33% Quite important, 24% Do not know, 26% Not so important, 12% Not at all important
- **Norway**: 27% Very important, 24% Quite important, 27% Do not know, 37% Not so important, 16% Not at all important
- **Iceland**: 22% Very important, 25% Quite important, 6% Do not know, 27% Not so important, 21% Not at all important
- **Sweden**: 15% Very important, 25% Quite important, 28% Do not know, 38% Not so important, 17% Not at all important

**Information on which country the primary products originates from**

- Fresh meat, Smoked ham and the Meat in a sausage is considered to be very important to know and the country from which the primary products come from.
- Its also considered to be important to know from what country the meat in a pizza originates from – Denmark puts fresh fruit and vegetables a head of this put the meat on a pizza is also considered to be important to know where is originates from.
- To have the knowledge from where – fresh/ raw and foremost fresh/ raw meat, followed by fresh vegetables and fruit - originates from are considered to be of most importance.
- To have the information on where the primary products originates from in a processed product i.e jam is also considered to be important, but not as important as when the product is fresh/ raw.
Question 7

Today there are different ways of displaying country of origin. In regards to meat it could be the country of birth, the country where the animal was raised, where it has been slaughtered, where it has been butchered or the country where the finished product was manufactured and packaged. In regards to fruit and vegetables the product might display the country where the fruit or the vegetables where grown or the country where the finished product was manufactured or packaged.

In order to make it possible to make the conscious choice of a certain food product, how do you consider the country of origin should be shown on the package?

1. Country of origin
   "Det ska vara ursprungslandet som ska stå på förpackningen."
   "Ursprunget är viktigare än slutprodukten."

2. Where the food is grown/ picked
   "Frukt och grönt: det ska stå var de kommer ifrån, där de odlats. Det är så nära hur det besprutas."
   "Med frukt och grönsaker vill jag veta vart de odlats."

3. Where the animal was born, bred
   "Det land där djuret är uppfött är allra viktigast. men gärna lite info om vägen till butiken."
   "När det gäller kött ska det framgå var djuret är uppfött."

4. Where the products was packed/ produced
   "Det skall stå i vilket land varan har förpackats."
   "Det ska stå var den färdiga varan är förpackad."

5. "There should be information about everything"
   "Både stå att allt som är innehåll i produkten."

6. Where the animal was slaughtered/ butchered

7. Country (text/symbol/flag)

8. Clearly printed information, easy to read
How should the country of origin be shown on the package?

Top of mind - Norway

1. Country of origin
   "It is very important that the country of origin is stated.
   "It can also be mentioned on the product label."

2. Clear information in print, easy to read
   "Good visibility, it is easy to see...
   "Angled with clearly legible text."

3. Where the product was produced
   "How the product is packaged and producer."
   "Producer must also be visible."

4. Where the animal was born/bred
   "Where the animal that was born and has grown up."

5. Symbol with flag of the country of origin
   "Have a flag on the package."
   "The animal comes from this country with flag."

6. Ingredients, content

7. Happy with how it is now

8. There should be information about everything

How should the country of origin be shown on the package?

Top of mind - Denmark

1. Country of origin
   "The country of origin must be clearly visible!
   "It is important that the country of origin is visible in the form of a form.
   "The country of origin must be clearly visible."

2. Where the animal was born, bred/where the fruit was grown/picked
   "Where the animal was born and grown."
   "Where the fruit was grown or picked."

3. Country where the food was packed/produced
   "Where the food was packaged/produced."
   "Where the food was packaged and processed by the country."

4. There should be information about everything
   "There should be information about everything,
   "Such as the country of origin, region, and
   "expiration date and harvest date."

5. Country marked with flag, symbol
   "The country name, flag, symbol."
   "The country name can also be visible on the package."

6. Where the animal was slaughtered/butchered

7. It should say if it is Danish

8. Clear information, easy to read in print

How should the country of origin be shown on the package?
How should the country of origin be shown on the package?

Top of mind - Finland

1. Country of origin
   "The country of origin is the most important."
   "When it comes to meat products it is good to know where the animal in question was bred, the country."

2. Where it was produced/ where it was packed
   "Country where it was packaged - packager is responsible for the product."
   "Both are equally important - the country of origin and country of manufacture.
   "If not easily readable by the consumer, then it makes little difference which information is slanted slightly more to the left."

3. Where the animal was born/ bred
   "Country where the animal was grown.
   "Information about where the animal was grown is not easy to read.
   "The whole chain is very important to know.
   "The animal must be fed in a certain way so that it is not dangerous in terms of health.
   "Consumer also wants to know where the animal was born.
   "Information about the country of origin should be very easy to read."

4. Clear information in print, easy to read
   "To finish and clearly visible" "It should be easy to read, without glasses even."

5. Should be information about everything
   "The whole chain is very important to know."
   "All the information could be there but really: Do we have any real choice?"

6. Country (flag, symbol)

7. Where the animal was slaughtered/ butchered

8. Where the fruit was grown/ picked

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How should the country of origin be shown on the package?

Top of mind - Iceland

1. Country of origin
   "Country of origin, birth place of the animal."
   "Origins, would be good to know. Where the animal is born."

2. Where it was produced/ where it was packed
   "Where final packaging took place."
   "Where produced and packaged."

3. Where the animal was born/ bred
   "Country where the animal was grown."
   "I think there should be information on where the product is grown/bred."

4. Where the fruit was grown/ picked
   "Where the animal was bred."
   "Fruit where grown and processed."

5. There should be information about everything
   "Everything mentioned should be stated. Country where it is bred, slaughtered, packaged and produced and country where grown.
   "All the information could be there but really: Do we have any real choice?"

6. Where the animal was slaughtered/ butchered

7. I don’t care / It is OK as it is

8. Clear information in print, easy to read
Some Comments in general

- The information on a package tends to come from what I would like to have personally in order to be able to make a choice for myself so that I will not become ill.
  - Best before date
  - Contents of ingredients
  - Country from which the product or content originates from

- Country from which the product or content originates from is of special importance when it comes to fresh and foremost the fresh/raw meat.

- A minimum size of text is considered very important as well.

- A general comment is also that women find issues of this kind more important. The same goes for level of education, higher level finds the issues more important. Attracts women more that
Food Labelling from the Consumers point of view

By Ellen Bjørkum, The Consumer Council of Norway

Currently a number of aspects of labelling legislation are up for review by the European Commission. In February 2006, the Commission published a consultative document on the labelling of food and non-food products.

One of the fundamental consumer rights is that of consumer choice. This requires access to product information that is accurate and understandable and that allows comparisons to be made between products. We believe that labelling provisions should be statutory in order to ensure that they are applied consistently by all sectors of industry, thereby facilitating meaningful and informed food choices. A uniform regulation is required throughout Europe and this will never be achieved via self-regulation.

Labelling is one of the most important source of information for consumers. According to a Norwegian study - 62% reads the labelling often or now and then. This means that quite a lot of consumers seldom reeds the labelling. When information is not being used, it must not be assumed that it is not required but instead should be looked at to see how it can be improved. Many consumers find the information difficult to understand or do not have time to read it. Research also shows that consumers find it difficult to locate and read information mainly due to small font size, bad contrast and lack of consistency in the positioning of information. There is a need for clear guidance on the use of consistent and meaningful language on labels. The font size should be standardised and a lower limit needs to be set for character sizes. Presentation of the information should be in a standardised format and requirements need to be set for contrast. Separation of mandatory from marketing information should also be considered.

Research show that consumers are confused about the nutritional information given on foodstuffs – it’s limited and difficult to understand. We believe that such information must be mandatory for all products containing the “big 8” – energy, protein, fat of which is saturates, carbohydrates of which is sugar, fibre and sodium/salt, plus transfat. Consumers often shop in a hurry and have limited time to read on the back of the pack. To make it easier for consumers to quickly and easily make a healthy choice we need a simplified signposting system at the front of the pack, which highlight important nutrition information (“big 4” – sugar, salt, fat, satu-
rated fat). An ideal system should allow comparisons between food categories as well as across food categories. The preferred label scheme should be based on available consumer research and agreed scientific criteria as what is the most useful and easy to understand for all consumers. It is therefore important to evaluate how consumers use and understand already existing labelling systems f.i. in countries like Sweden, England and Australia. Research should also be undertaken in Norway to learn more about what Norwegian consumers need and how they understand different labelling schemes.

Consumers are not only interested in information about nutrition and health. Many consumers also want more information about the origin of the food that they eat for reasons such as quality, animal-welfare, environment and food-safety. This information should be mandatory, as for fresh beef. It must also include the country’s name – not only “EU”/”third country”. Animal welfare has been debated in many countries. Norwegian consumers find animal welfare important, but worry less than consumers in other countries. They seem to prefer that animal welfare is regulated by law and does not see this as a matter of consumer choice. Experiences in other countries shows that consumers does not know what different welfare schemes mean. If welfare labelling should have a meaning to the consumers they need to know what it means. Greater clarity in this area would be welcomed and standardised animal welfare indicators must be applied.
## Appendix 3: List of participants

<table>
<thead>
<tr>
<th>Fornavn</th>
<th>Etternavn</th>
<th>Organisasjon</th>
<th>Land</th>
<th>E-mail</th>
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<tr>
<td>Aina Marie</td>
<td>Lien</td>
<td>Stabburet AS</td>
<td>Norway</td>
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</tr>
<tr>
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<td>Jansson</td>
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<td><a href="mailto:anette.jansson@celiaki.se">anette.jansson@celiaki.se</a></td>
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<tr>
<td>Anita Utheim</td>
<td>Nesbakken</td>
<td>Food Safety Authority</td>
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<td>Anne Katrine</td>
<td>Wahl</td>
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<td>Norway</td>
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<tr>
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<td>Livsmedelsverket</td>
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Appendix 4: Questionaire
1. We are here to talk about food labelling. Let’s start with a short introduction. Please tell us your name, where you work, and in few words describe what you think characterizes the perfect food label.

2. Food label is only one way to provide information. Let’s try to develop a list of additional means that could be used to pass on information from the seller to the consumers.

3. To focus on food labelling again: let’s make a list of keywords what comes into your minds when you think of today’s labelling.

4. The EU-commission has highlighted some specific themes that they like to explore further. You can find them in the left column in the table below. Please take a look at the table for five minutes. What are the five most important issues? Number them 1-5, 1 is most important.

5. Focus on the top five and fill in the boxes in the columns.
<table>
<thead>
<tr>
<th>Themes</th>
<th>How should this be done?</th>
<th>Pros: What might the benefit of this be?</th>
<th>Cons: What might the disadvantages of this be?</th>
<th>Why? What aspect is the most important reason for your choice?</th>
</tr>
</thead>
</table>
| Common themes | Structure  
- One piece of legislation with labelling rules  
- Regulation or Directive | | | |
| | Scope  
- Small and medium sized enterprises (SME): The same rules for SME:s or exceptions  
- Mandatory labelling on pre-packaged foodstuffs  
- Unpre-packaged foodstuffs | | | |
| | Presentation of labels  
- Size  
- Format  
- Logos or symbols | | | |
<p>| General Food Labelling (in today’s legislation) | Name of the product | | | |
| | Ingredients list | | | |
| | QUID | | | |
| | Net quantity | | | |</p>
<table>
<thead>
<tr>
<th><strong>Shelf life date</strong></th>
<th></th>
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</thead>
<tbody>
<tr>
<td><strong>Storage conditions/conditions of use</strong></td>
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<td><strong>Name and address of the manufacturer, packager, seller</strong></td>
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<td><strong>Origin labelling, if omission of this would mislead the consumers</strong></td>
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<td><strong>Instructions for use</strong></td>
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<td><strong>Nutrition labelling</strong></td>
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<tr>
<td><strong>Nutritional declaration</strong></td>
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<tr>
<td>• Which nutrients</td>
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<tr>
<td>• Voluntary /mandatory</td>
<td></td>
<td></td>
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<tr>
<td>• Sign posting /symbol labelling</td>
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<tr>
<td>• Presentation (tabular /linear)</td>
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<tr>
<td><strong>Other food issues</strong></td>
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<td><strong>Origin labelling</strong></td>
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<tr>
<td>• Mandatory</td>
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<tr>
<td>• Guidelines</td>
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<tr>
<td>• Which type of food</td>
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<tr>
<td><strong>Ingredients list on alcoholic beverages</strong></td>
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<td><strong>Welfare labelling</strong></td>
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<td><strong>GMO labelling</strong></td>
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<td><strong>Health warning on alcoholic beverages</strong></td>
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<td><strong>Ethical labelling</strong></td>
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</table>

**Ending:**
What final advice do you have for the authorities revising the directive?