

AWASH

Australian Division
of World Action on Salt & Health

Submission to the Food Regulation Standing
Committee for a Front of Pack Labelling
Policy Guideline

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1.0 Preface

Cardiovascular disease is the leading cause of death in Australia, accounting for some 48,000 deaths in 2004. Excess salt consumed throughout life causes blood pressure to rise with age, which increases the risk of serious cardiovascular disease.

The good news is that reducing salt intakes can substantially reduce blood pressure levels for all population groups, helping to reverse these risks. The Australian Division of World Action on Salt and Health (AWASH) (www.awash.org.au) is a growing network of representatives from the medical profession, scientific community, food industries, consumer associations, education and health promotion bodies. All support the health benefits of a population-wide reduction in dietary salt. AWASH is currently hosted by the George Institute for International Health in Sydney (www.george.org.au).

In May 2007, AWASH launched the Drop the Salt! campaign to reduce daily population salt intakes to below 6 grams over five years. It had three clear objectives:

- An average 25% reduction in the salt content of processed and catered foods
- Increased population knowledge of the benefits of low salt diets
- Clear labelling of foods that makes the salt content immediately apparent

Considerable progress has been made. Salt reduction has been on the health policy agenda in Australia for over 25 years and yet never before has there been a coordinated national campaign, engaging both the food industry and government to achieve clear targets.

Reducing salt in foods

Since the campaign launch, the food industry has demonstrated a strong commitment to action. Many companies have made further reductions in salt or pledged future action. AWASH has established a database to monitor changes in salt levels in foods. Over the next year we will be looking to ensure that more companies across all sectors of the food industry have salt reduction programs in place. We are also considering the usefulness of introducing targets for salt levels in key product categories.

Raising consumer awareness

Our annual consumer polls have shown that consumer awareness about salt issues has not changed. This is not surprising. Changing consumer awareness requires a government funded sustained and comprehensive social marketing campaign. In the meantime, AWASH will

continue to use the media, organise high-profile meetings, and issue regular stakeholder bulletins to ensure salt reduction remains high on the public agenda.

Improving labelling

Improved food labelling to enable people to choose lower salt foods is also key to the AWASH strategy. Currently, whilst a number of improved labelling formats have been proposed, there is no strong evidence for what would work most effectively. There is potential for consumers to be even more confused by some of the schemes being introduced. The Federal Government needs to take leadership on this and act quickly to ensure that such an important public health opportunity is not lost.

The urgent need for government action

The magnitude of the health gains achievable through population salt reduction is very large. Recent estimates suggest the deaths averted by moderate reductions in salt consumption would be at least as great as those achieved by plausible reductions in smoking. Reducing population salt intakes in Australia to below the currently recommended maximum, could avert tens of thousands of cardiovascular events in Australia by the year 2018. While much can be achieved through persistent advocacy, research and voluntary measures by industry, national leadership will be vital to the success of this campaign.

Further information about the AWASH strategy can be found in the Drop the Salt! Strategic Review 2007-8 which is attached with this submission.

AWASH presents this submission to the Food Regulation Standing Committee (FRSC) to assist in the development of a front-of-pack (FoP) policy guideline to the Australia and New Zealand Food Regulation Ministerial Council. The submission is made on behalf of the AWASH Secretariat, a group of individuals with broad scientific, policy, project management and communications expertise, who coordinate the day-to-day activities of AWASH and take responsibility for its outputs.

AWASH supports the principles for FOP labelling developed at the Australian Chronic Disease Prevention Alliance forum held in February 2009. This forum was attended by a number of health experts and representatives of major health organisations to discuss and reach agreement on a set of key principles that should be met by any FoP food labelling system proposed for implementation in Australia. A copy of the forum Consensus Statement is provided at Attachment A. In addition, a summary of research both overseas and locally was developed and disseminated at the forum and is included at Attachment B.

2.0 The need for FoP labelling regulation

As outlined in the FRSC consultation paper, the nutritional status of Australians is typified by an increasing intake of unhealthy, non-core food and beverages, and this unhealthy dietary pattern is seen more prominently in the most socially disadvantaged groups. Further, these unhealthy dietary patterns are contributing to the rising prevalence of overweight and obesity and associated nutrition-related chronic disease (1).

Both adults and children consume too few serves of fruit and vegetables. Almost all (80-90%) Australian adults consume less than the recommended five serves of vegetables per day, and 50% of adults eat one serve or less of fruit per day, compared to the recommended two serves (2;3). Also, only 1-2% of older children meet the recommend three serves of fruit (excluding fruit juice) and about one-quarter of younger children and 1–11% of older children meet the guideline for vegetable intake (4).

Further, more than half of all Australian women (52%) and two-thirds of men (67%) are overweight or obese (5), with the prevalence of overweight and obesity increasing in more recent years (6). Importantly, those in the most socially disadvantaged groups and Indigenous Australians are more likely to be obese than those in the most advantaged groups (7). The 2007 Children's Nutrition and Physical Activity Survey, indicated that 23% of Australian children aged 2 to 16 years are overweight or obese (4).

In seeking potential strategies to address obesity and nutrition related chronic diseases, there is mounting evidence that food labels can assist consumers to make healthier food choices (See Attachment B)(8), with the potential to improve health outcomes. However, research investigating consumers' comprehension of Nutrition Information Panels (NIPs) indicates that some consumers can find these confusing (9-11) and difficult to interpret (12). NIPs were made mandatory on food labels to improve the level of information available to consumers and assist them to make informed choices about the foods they buy. However, food labels also have the potential to actively encourage consumers to make healthy choices by presenting nutrition information in a format that is easy to interpret at a glance. An adjunct to the NIP, that is easier to understand, is therefore sought, with moves both overseas and in Australia and New Zealand to develop systems for conveying nutrition information in a more meaningful way on the front of food packages. FoP labelling has the dual potential for both educating consumers to identify healthier food products, as well as encouraging food product reformulation and innovation.

3.0 Summary of recommendations

AWASH strongly supports the introduction of FoP labelling which includes an interpretive element to assist consumers to make healthier choices. The key principles underpinning FoP labelling are that it should:

- **Support consumers in selecting healthier food products.** FoP labelling should educate consumers and assist them to identify healthier food products.
- **Encourage healthier food product formulation.** FoP labelling should aim to spur healthier product development by the food industry.
- **Provide an interpretation of nutrition information for consumers that is quick and easy to understand.** FoP labelling must include both nutrient information and an interpretative aid which allows at-a-glance interpretation of nutrient information. This interpretive aid should be based on a ranking of individual nutrients with the possibility of having additional information on the overall product rating. Further research and consumer testing need to be undertaken to determine the most appropriate form of interpretive aid that should be adopted.
- **Complement rather than replace Nutrition Information Panels (NIPs).** FoP labelling must complement, not replace, existing nutrition information currently on the back or sides of food packages.
- **Be based on individual nutrient criteria, with different criteria applied to different food groups.** These food groups should reflect the core food groups denoted in the Dietary Guidelines, with an additional category for extra foods, and category specific nutrient criteria that consider the properties unique to that food group, and set benchmarks or standards that are appropriate to the nutritional composition. Dietary modelling should be used to determine nutrient criteria underpinning FoP labelling, based on Nutrient Reference Values and Dietary Guidelines.
- **Should, as a minimum, include labelling for: Saturated/Trans Fat; Salt/Sodium; and a measure of energy .** Consideration should also be given to including other nutrients relevant to particular food groups such as fibre for the bread and cereals, sugar for beverages or calcium for dairy products.

- **Be based on 100 g/mL of foods.** Factual information about the levels of key nutrients should be based on 100g or 100mL of the food or beverage product to avoid any manipulation of serving size information by food manufacturers.
- **Specify the absolute nutrient content of foods. The absolute quantity (g/mL/mg/kJ) of each nutrient** should be included on the FoP label. This will allow consumers to differentiate between products at a more discrete level.
- **Comprise one consistent system.** To avoid consumer confusion one consistent FoP labelling system should be introduced rather than a range of systems permitted.
- **Be based on independent consumer research, comparing a range of different FoP systems.**
- **Be introduced across all retail grocery food products eligible to carry a Nutrition Information Panel and to Quick Service Restaurants (QSR).** FoP labelling should be introduced across all packaged retail grocery food products that are eligible for NIPs, and QSR chains with standard menu items.
- **Be accompanied by public education.** An extensive public education campaign must accompany the implementation of FoP labelling to inform consumers how to interpret the labelling system in the context of other government healthy eating guidelines.
- **Be statutory in nature and fully enforced.** Only mandatory, legally enforced FoP labelling regulations will ensure that the system is equitably applied across all food products, giving maximum benefit for consumers. Compliance with the regulations will need to be independently monitored and enforced.
- **Be monitored and evaluated.** . The FoP labelling scheme will need to be monitored and evaluated to ensure that it meets its stated objectives

4.0 Considerations for the Ministerial Policy Guideline

4.1 *Key considerations for developing a FoP labelling policy guideline*

Questions:

Do you agree with the key considerations identified above?

Are there other key considerations that should be taken into account when developing this policy guideline? If so, please provide details of what should be considered and why.

AWASH agrees with the key considerations for a draft Ministerial Policy Guideline for FoP Labelling as outlined in the FRSC Consultation Paper. We agree that the development of this Policy Guideline should be based on research conducted both internationally and in Australia. However, due consideration must be given to the quality of this research.

Also, as noted in the Consultation Paper, the development of a FoP Policy Guideline must be consistent with broader public health objectives and existing health policies and form part of a broader framework for addressing obesity and chronic disease involving consumer education and other related initiatives.

In terms of the objectives of FoP labelling AWASH considers that in addition to guiding consumer choice to healthier food options, FoP labelling should also encourage the food industry to produce healthier food products.

The introduction of FoP labelling must not preclude legislative requirements for NIPs to be included on all eligible food packages, as per the Food Standards Australia New Zealand (FSANZ) Food Standards Code. While (interpretive) FoP labelling allows consumers to broadly identify healthier food products, more detailed nutrition information included in NIPs is still required for individuals with special dietary needs or disease states.

In addition, the Policy Guideline should also canvass:

- i. A clear strategy for monitoring and evaluating the success of the scheme.*

Too often legislation is introduced with no clear points of review and limited funding for evaluation. Given the importance of FoP labelling, we believe that a monitoring and evaluation strategy must be developed in parallel with the development of the FoP scheme, to

measure the impact and outcomes of this scheme against the goals and objectives. This should involve ;

- The collection of base-line data prior to implementation of the FoP labelling scheme (noting that this should not, however, delay the introduction of FoP labelling);
- The assessment of short term impacts e.g. changes in consumer awareness and understanding, changes to individual product composition or availability;
- The assessment of short term behavioural impacts e.g. changes in shopping behaviour or industry practices; and
- The assessment of long term outcomes eg, changes in population dietary intakes of nutrients included in FoP labelling (determined from population health surveys) , changes in nutrient profiles of particular food products and/or categories, or sales of healthier vs less healthy food options.

Evaluation should occur at pre-determined legislated times, such as at certain intervals (2, 5 and 8 years). Close consideration would need to be given to the indicators and impacts that should be measured and reviewed at each point. A period of two years may be an adequate time in which to consider short term product and behavioural impacts, while longer term outcomes may be assessed following a longer time interval. If necessary, the scheme should be appropriately adjusted over time in order to best meet the scheme's objectives of assisting consumers to make healthier food choices and encouraging the production of healthier food products.

The results of this evaluation must be transparent and reported by an independent body. This will assist in gaining industry support for, and compliance with the initiative, and the uniform application of the scheme to reduce consumer confusion.

ii. Outline for supporting consumer education.

FoP labelling cannot be implemented in isolation. Consumer education is required to support the introduction of FoP labelling and to inform consumers how to interpret the labelling system in the context of other government healthy eating guidelines. Social marketing strategies could also be considered to achieve broad reach.

iii. The recommended process for development and implementation of the FoP scheme.

FSANZ should be tasked with developing the FoP labelling scheme. We suggest FSANZ's development of the scheme is followed by a staged implementation timeframe.

The scheme should be developed in close consultation with relevant stakeholders including Commonwealth and state government food and health authorities, public health organisations, consumer organisations and the food industry. Industry consultation should focus on practical means by which to best implement agreed FoP labelling principles.

In addition, any FoP labelling scheme that is developed should be market tested prior to implementation to ensure that the preferred approach is the most effective means for communicating the information to consumers.

iv. The legislative framework that this labelling may be issued under.

AWASH strongly believes that FoP labelling must be embedded in legislative policy. The scheme could be enacted through FSANZ legislation, state based legislation or new stand-alone legislation. In any case, the legislative framework must be clear and enforceable, include meaningful sanctions, be actively monitored for compliance and independently overseen.

A legislative framework will assist in achieving necessary sustainability for FoP labelling. – if FoP labelling is introduced it is imperative that it be implemented for the long-term in order to build consumer acceptance and usage. Short term (within 2 years) and long term impacts (within 5 -10 years), should be tracked and monitored for evaluation.

v. Possibility for the use of the FoP labelling system for other initiatives.

FoP labelling may also be able to complement other schemes or new initiatives. For example, if an overall rating for food products was adopted as part of FoP labelling, it could potentially be used to determine whether a food could be advertised to children through television or other media. This would require further exploration.

4.2 Guiding consumer choice

Questions:

Do you consider that consumers should be supported to enable them to be able to compare foods consistently across the whole food supply or within a food category?

Do you consider that the information provided should relate to individual nutrients, whole foods, other?

AWASH agrees that FoP labelling must educate and guide consumers to select healthier food products. Further, FoP labelling must be equitably applied, so that all consumers across all demographics can access and understand this nutrition information. As noted in the FRSC

Consultation Paper, FoP labelling provides a potential policy instrument that has the capacity to increase population-wide awareness and understanding of nutrition information.

In order for FoP labelling to best guide consumer choice this scheme should:

i. Be based on individual nutrient criteria, with different criteria applied to different food groups.

We recommend that FoP labelling be based on individual nutrient criteria, with different criteria applied to different food groups. The criteria should take into account properties unique to that food group, and set benchmarks or standards that are appropriate to the nutritional composition (e.g. fibre criteria for breads, cereals, rice, pasta and noodles). These food groups could reflect the core food groups denoted in the Dietary Guidelines, including:

- breads, cereals, rice, pasta and noodles;
- vegetables and legumes, fruit;
- milk, yoghurt and cheese;
- lean meat, fish, poultry, eggs and nuts;
- fats and oils and
- an additional group for all other foods and other beverages,

FoP labelling should promote healthy foods as well as highlighting those foods that are less healthy and which should be consumed only occasionally.

Nutrient criteria for food groups should be established through modelling based on the Nutrient Reference Values and Australian and New Zealand Dietary Guidelines.

ii. As a minimum, include labelling for saturated/trans fat, sodium, and a measure of energy

FoP labelling must address saturated/trans fats (combined); sodium; and a measure of energy. However, while energy is central to body weight, consumers generally have a very poor understanding of kilojoules (KJ) as a measure of energy. Alternatively, sugar and total fat could be included on FoP labels as a proxy for energy; however this fails to recognise the contribution of total carbohydrates and protein to energy.

We recommend that further consumer testing be undertaken to determine how best to display information about energy on FoP labels and whether consumer education in this area may be

required. Findings from recent research conducted by the UK Food Standards Agency, due to be released later this year, may help to inform this issue.

Consideration should also be given to including other nutrients relevant to particular food groups, such as fibre for the bread and cereals food group, sugar for beverages and calcium for dairy and alternatives. These could readily be identified by FSANZ in consultation with public health professionals and drawing on international experience.

Importantly, the number of nutrients displayed on FoP labels should include only those with the largest public health significance. The addition of other nutrients, such as vitamins and minerals for which there are no apparent population deficiencies may only serve to distract consumers (13).

The critical points are that the front of pack nutrient labelling must be relevant to the food group, be focussed on key nutrients of greatest public health significance, and be clear, simple and meaningful to consumers.

iii. Apply to all foods eligible to carry a NIP and Quick Service Restaurants.

FoP labelling should be applied to all food products eligible to carry a NIP as per the FSANZ Food Standards Code, Standard 1.2.8. That is, FoP labelling should apply to all packaged foods, with the exception of very small packages and foods that are packaged for immediate consumption. Note that food products should carry both the FoP label and the existing NIP.

The provision of nutrition information should also be provided at the point-of-sale at QSR on the trans-light menu display where the product is shown. A modified version of the FoP label may be required in this setting, such as providing an overall rating for a food or meal rather than rating individual nutrients within a product. QSR are defined here as high volume chain restaurants that have a standardised menu and meal offerings and quality assurance systems in place.

iv. Use a consistent labelling format across all food products.

The format of FoP labelling should be applied consistently across all products and uniformly applied throughout Australia. Consumer research indicates that multiple and inconsistent FoP labelling systems are perceived as more difficult to understand than a consistent labelling approach (14).

v. Include both factual nutrient information and an interpretive element.

AWASH believes that FoP labelling should include information on both the absolute nutrient content of food products as well as an interpretive element based on individual nutrient ranking together with the option for an overall product rating. Interpretational aids are critical

in assisting consumers to assess the nutrient contribution of specific foods to the overall diet, while the provision of the absolute number of grams of key nutrients will allow consumers to differentiate between products at a more discrete level.

vi. Be based on 100g or 100 mL

In the absence of standard serving sizes in Australia and New Zealand, criteria for the levels of key nutrients should be based on 100g or 100mL of the food or beverage product to avoid serving size manipulation.

4.3 Aims of FoP labelling

Questions:

Are there other aims that should be considered?

To what degree are these aims or any other aims you believe should be considered consistent with or different to current FOPL schemes?

Should there be a priority list for the aims provided in the policy guideline?

Should such scheme be mandatory or voluntary to achieve the aims of FOPL?

AWASH is in agreement with the aims proposed in the FRSC Consultation Paper for FoP labelling. The overarching goals of FoP labelling are to:

- Increase the number of people eating in accordance with dietary guidelines.
- complement and support other strategies designed to address the increasing prevalence of obesity, poor nutrition and chronic disease

A FoP labelling scheme can contribute to these overall goals by:

- Empowering consumers to make healthier food and drink choices; and
- Encouraging industry to improve the quality of the food supply by addressing nutrient composition, product marketing and portion size.

The food industry in Australia is already engaged in improving the nutritional profile of the food they manufacture and sell. Further encouragement to industry to reformulate their products and introduce innovations will increase the public health impact of FoP labelling.

AWASH strongly supports the introduction of a mandatory FoP labelling scheme, which is strictly enforced to prevent industry non-compliance; ensure better consistency between labelling formats, thereby minimising consumer confusion; maximise the public health impact

of the scheme; and ensure that compliant companies and food service outlets are not disadvantaged relative to non-compliant companies. In order to encourage compliance, legislation should be underpinned by appropriate sanctions which are actively enforced.

4.4 Issues to consider in the development of a FoP labelling scheme

Question:

What other issues should be taken into account if a FoP labelling scheme is developed?

AWASH agrees with the considerations listed in the FRSC Consultation Paper for the development of a FoP labelling system. The introduction of any FoP labelling scheme must first and foremost consider the system that is most beneficial for guiding consumer choice towards healthier food products. Other considerations, such as cost to industry, must be considered as secondary to this primary aim.

4.5 Policy options

Questions:

Do you consider that there should be Ministerial policy guidance on FOPL?

Which policy option do you prefer and why?

Are there other options that should be considered?

What are the impacts &/or cost &/or benefits of pursuing each of the options?

AWASH supports the development of a Ministerial Policy Guideline for FoP labelling. AWASH strongly supports FoP labelling which includes both nutrient information and an interpretive aid which allows at-a-glance interpretation of nutrient information to assist consumers to make healthier choices. This interpretive element should be based on a ranking of individual nutrients with the possibility of having additional information on the overall product rating. Further research and consumer testing need to be undertaken to determine the most appropriate form of interpretive aid that should be adopted, whether this be colour coding or an alternative mechanism.

This policy option would succeed in addressing all of the specific policy principles including guiding consumer choice towards healthier food products, providing an equitable strategy that can be accessed and understood by all consumer groups and providing an incentive for food product reformulation and innovation.

Comments on proposed options

Option 1: Status quo

For the reasons highlighted above, including i) the escalating prevalence of overweight and obesity; ii) poor population nutrition; iii) the health gap between socio-economic and ethnic groups; and iv) the inadequate understanding of current food labelling, maintaining the status quo is not a viable policy option. In the absence of government legislation on FoP labelling, food manufacturers and other stakeholder groups have introduced an array of varying nutrition labels. Retaining the status quo will not address potential consumer confusion arising from these varying schemes. The food industry cannot be expected to voluntarily introduce FoP labelling which guides consumers away from unhealthy products.

Option 2: Provide guidance only on scope, aim and matters to be taken into account if any FoP labeling scheme is developed

Consumer research on FoP labelling clearly indicated that consumers support the introduction of a single consistent FoP labelling scheme across all food products (14). The lack of clear guidance on the need for interpretative FoP labelling may result in the development of regulation for a non-interpretative scheme, or worse, the introduction of diverse labelling systems across the grocery market.

Option 3: Australia/NZ FoP labelling should be a non-interpretive scheme

As noted in the Consultation Paper and Attachment B, non-interpretive nutrition information can be confusing for consumers, while interpretive systems assist consumers to identify healthier food products and put these products into the context of their overall diet. Policy guidance for a non-interpretative FoP labelling will fail to address the policy principle for FoP labelling to be understandable and meaningful to all socio-economic groups.

Option 4 Australia/NZ FoP labelling should be colour coded- interpretive

AWASH recognizes the need for FoP labelling that includes an interpretive aid to assist consumers to interpret nutrient information at-a-glance. However, further research and consumer testing need to be undertaken to determine the most appropriate form of interpretive aid that should be adopted, whether this be colour coding or an alternative mechanism.

Additional policy options

An additional policy option that should be considered is a system incorporating interpretative labelling for individual nutrients combined with an overall interpretive ranking for the food product. We recommend that further research be conducted to ascertain if an overall product ranking would be useful for consumers and the most appropriate way to present this information.

AWASH strongly supports the introduction of a mandatory FoP labelling scheme, which is strictly enforced to ensure industry compliance; ensure better consistency between labelling formats, thereby minimising consumer confusion; maximise the public health impact of the scheme; and ensure that compliant companies and food service outlets are not disadvantaged relative to non-compliant companies. In order to encourage compliance, legislation should be underpinned by appropriate sanctions which are actively enforced, in line with the Consensus Statement at attachment A.

AWASH believes it is essential for government, health professionals, public health representatives and the food industry work together to identify/create the best system for Australia which meets these goals.

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