Better Food Labelling – Written Responses

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Executive summary

The Food Standards Agency is considering how it can help to support informed choice by improving food labelling. In doing so it is drawing heavily on consumer research and the views of interested consumers, as expressed during the Better Food Labelling initiative.

This report summarises the written responses received during the initiative. The key areas identified in the responses as requiring action were:

- **Ingredient listing.** Including indicating the presence of GM ingredients, full declaration of allergens, identification of products / ingredients of animal origin, clearer identification of additives.
- Country of Origin labelling. Particularly for meat and poultry.
- Production methods for food. Includes concerns over animal welfare, ethical and environmental concerns (e.g. fair trade foods) and information about the use of pesticides and growth hormones.
- Standardisation of food labels. Including a mandatory format, minimum font size, standard print types and colours, and use of standard symbols.
- Date marking. Especially the meaning of "best before" and "use by". Also
 includes calls for clearer indications of how long food will last once opened
 and date of production of foodstuffs.
- Nutrition Labelling. Suggestions that this should become mandatory, that different types of fat (e.g. unsaturated), added sugar and salt should always

be listed. Preference for fat declaration as percentage of total calorie content and nutritional contents shown as a percentage of daily target.

• **Misleading claims / information.** Such as "% fat free", unclear definitions of "low" and "high", marketing terms such as "healthy" and "country style" and the use of "lite" and "organic" when used to imply products are healthier.

Next steps

The Agency is considering how it can respond to these ideas. The options available to it are:

- immediate changes in national food labelling regulations (where this is possible within the constraints of European legislation and wider international obligations);
- formulating a new UK strategy for influencing legislation within the EU and more widely;
- encouraging voluntary action by UK manufacturers and retailers in advance (or instead) of new legislation (which may include an agreed strategy for harnessing new technology, developing voluntary codes of practice etc);
 and
- developing and disseminating advice on the use of labels.

The Agency plans to discuss food labelling at its October 2000 Board meeting.

Background

The objective of the Better Food Labelling Initiative was to find out what consumers think about food labels, and particularly what improvements they would like to see.

The exercise focused on the following questions:

- What information do you want to see on food labels?
- Where and how do you want to see information on the label?
- What information on the label is most important to you and why?
- Is any label information unnecessary or misleading? If so, what?
- If the label makes a claim about the food, should this be controlled? How should these claims be controlled?
- What sort of information should be given for food that is not sold prepackaged?

Leaflets were distributed through consumer interest groups, public libraries and supermarkets inviting comments on these issues. In addition an open meeting held on 2 March attracted 85 participants, mostly ordinary consumers and public interest groups. A report of this meeting has already been published by MAFF ("Better food labelling Open Forum 2 March 2000" - PB 4955) and a summary of the discussion that took place may be found at **Annex A.**

This report summarises the points raised by those who responded to the initiative. In all 1,278 responses were received by the closing date of 20 March 2000, 93% of them from individuals and 47% of them sent by e-mail. A list of the organisations that submitted responses to the initiative may be found at **Annex**B. A detailed quantitative analysis of the responses has not been carried out because the respondents are not a representative sample of the general public.

To give a feel for the level of interest in the various topics raised the 'top 20' issues, that is those mentioned most frequently, are listed in **Annex C**.

What information do you want to see on labels?

Ingredient listing

The single issue mentioned most frequently by those responding to the consultation was the need for clear, comprehensive information about the use of GM, and GM derived, ingredients, including those that have been subject to processing (eg additives, enzymes, cultures, oils, starches and lecithin). For many this interest also extends to wanting information about the use of GM ingredients in feed given to animals which are themselves used in food production (eg a declaration on the label that the food may have come from animals fed on GM feed). A number of respondents object to any permitted level of tolerance in making "GM free" claims; if foods claim to be GM free they should be totally GM free.

The overwhelming majority of those who raise ingredient listing as an issue want to see full, mandatory ingredient listing, with no exemptions. Many want to see the removal of the ingredient listing exemptions applicable to specific foods (eg chocolate and alcoholic drinks). They also want general ingredient listing exemptions to be removed (eg the rule that exempts ingredients that are part of a compound ingredient making up less than 25% of a product from being listed). Responses also include calls for specific information about ingredients currently identified by names that give no clear indication of their specific origin. For example, terms like "animal fat", "hydrolised vegetable protein", "mixed nuts", "lecithin", and "starch" are criticised as failing to provide information that is sufficient properly to inform choices.

The way additives are identified in ingredient lists concerns a large number of respondents. Some want to see them always identified by their E number, whilst others prefer the use of a name (ideally one in "plain English"). Several find the

mixing of E numbers and names confusing. A number of respondents argue that flavourings should be treated like other additives and required to give a name or E number rather than just being identified by the name "flavourings".

Some respondents, especially those with health problems or special dietary needs, want clear information about the quantities of each (or some) ingredients to be given, possibly as a percentage of the total net pack content, to enable them to make choices. For some this as an essential aid to assessing value for money by highlighting, for example, the proportion of added water. Some also want the amount of meat (excluding offal) to be given for meat products.

Allergens

There is a great deal of criticism of "catch-all get out" phrases and "blanket disclaimers" for allergens; many believe statements they consider ambiguous, like "may contain", are unacceptable. The Anaphylaxis Campaign comments that people with allergies are becoming increasingly angry and despondent with the proliferation of food labels which state "may contain nut traces" and calls for an initiative to tackle the issue of disclaimer labelling.

On the other hand, declarations about the specific suitability (or unsuitability) of a food for a particular dietary requirement or allergy are considered by a significant number of those raising allergens as an issue to be helpful. For example, "gluten free", "suitable for coeliacs", "suitable for diabetics" and "contains nuts". The use of panels to list those allergens that a food contains is also considered to be helpful in identifying foods that contain ingredients that need to be avoided.

The point is made repeatedly that labelling needs to be sufficiently precise to enable those with specific allergies to avoid those ingredients to which they react. The use of terms like "nuts", "vegetable protein", "lecithin" and "modified starch" may unnecessarily restrict the choice of those who are allergic to some, but not all, of the substances from which these ingredients may be derived. For example, soya, peanut, corn or egg may all be used to produce lecithin; and

potato, rice or wheat may be used to produce modified starch. The removal of all ingredient listing exemptions and the consistent and uniform labelling of all products (eg the use of "peanut" rather than "groundnut") is considered essential.

Some consider it important always to give clear indications on the label when a product has been reformulated. Several respondents call for a distinction to be made between the use of natural and chemical additives, including flavourings.

Animal-derived products

Those observing strict religious or other dietary regimes often find it difficult to decide from the information on the label if a food is genuinely free of animal products. For example, some E numbers and names used for additives fail to distinguish between those derived from animal rather than vegetable sources. The development of a standard that would ensure or guarantee products as being suitable for vegetarians or vegans would help them make more informed choices.

Production methods

Improved animal welfare related labelling is high on the list of priorities for many respondents, and letters on the subject have continued to arrive since the formal close of the consultation. The majority of those who raise this issue want to be able to support those foods produced humanely and think it essential that information about the production systems used should be given clearly on the label. The clear identification of meat deriving from ritual slaughter is considered important by some, as is the clear identification of products meeting Halal requirements.

Some want labelling to reflect other ethical and environmental concerns (eg fair trading, working conditions, and systems to indicate the distance a food has travelled). This is particularly so in the case of meat and egg products, where many want to know whether these foods are produced in intensive or free range farming conditions.

Many respondents want information on the label about the use on, or presence and level in, food of heavy metals; artificial fertiliser, pesticide and herbicide residues; nitrates; nitrites; phosphates; and waxes (on fruit), with the majority of those raising this doing so in the context of fruit. Some want the use of growth hormones (like recombinant Bovine Somatotrophin in milk production) to be clearly indicated, including when such foods are used as ingredients.

Several respondents mention the need for compositional controls for products like fat spreads and meat products to ensure that consumers are properly protected.

Origin labelling

There is a very high level of interest in clearer country of origin indications, particularly in respect of foods described as British. In addition the majority of those raising this issue want more information about the country of origin of the products they buy, particularly on meat and poultry, and their products. Respondents are looking for clear information about the country of rearing of the animal rather than the country where the food is produced or packed. Some also mention origin in connection with fish (wanting to know if it is caught at sea, and if so where, or farmed).

Information on risks and suitability for certain groups

A few respondents suggest some indication of the maximum safe daily intake for the additives used should be given in certain circumstances (eg where risk can be cumulative). Information on units of alcohol is important for some.

Some respondents feel it important to have clear information about the quantities of certain ingredients (like sugar and salt), particularly those with specific dietary requirements (eg diabetics).

Information about the date of production, and specific information about the name and address of the manufacturer of the food (rather than the packer or seller) is felt by some to be important in the event of problems.

The importance of clear cooking instructions for certain products (like kidney beans which for safety reasons need to be cooked properly, and raw meat) is stressed by some; the practice of hiding cooking instructions inside packages or on the reverse of labels is criticised by others. Several respondents want to see clearer thawing instructions on frozen foods.

Many are confused by date marks, especially "best before" which it is felt gives no clear indication about whether a food can be eaten after the date has expired. They call for improved consumer education to ensure people realise the difference between date marks aimed primarily at ensuring product safety (use by) and those aimed at product quality (best before). Clearer indications about how long the food will last once it has been opened are also required.

Several respondents are concerned about heavily fortified functional foods and the dangers these could present to certain groups consuming high levels of some nutrients whilst still being deficient in others.

Nutrition labelling

The strong theme emerging from the large number of responses which raise this issue is that nutrition labelling should be mandatory, but needs to be revised to provide clearer information. The majority of those who raise this issue want information about the fat, salt and sugar content of food. Some suggest the presence of substances people may wish to avoid (fat, acids, sugar, salt) should be given prominence, with information about the beneficial elements (fibre, protein) taking second place. Others want different fats always to be listed (saturates, unsaturated, polyunsaturated, monounsaturated and trans fatty acids).

Other suggestions include indicating the percentage of total calories from fat, the amount of salt per serving and the recommended daily intake, the amount of salt instead of the amount of sodium, the amount of calcium, the compulsory indication of the amount of fibre, clearer definitions of "low" and "high". Some want foods to be categorised (eg "eat as much as you like", "eat in moderation", "eat occasionally") or colour coded red, amber and green as appropriate. Some think there needs to be room for information about nutritional requirements for children. Others would prefer to see nutrition information declared as a straight percentage of target daily intake rather than as per 100g or per serving / can / package.

How should information be presented on the label?

A great many respondents report serious difficulties in using the information on food labels because of the way it is presented and the print size used. The majority of those who raise this issue feel that standard print types and colours (preferably black on white) should be adopted for all foods, and/or that the labels themselves should conform to a standardised format so that information always appears in the same place on a label, whatever the food. Many in this group feel the print size on labels is too small and some suggest there should be a statutory minimum. Some criticise the balance between the amount of space devoted to illustrative and advertising information (too much) and that given to vital information like cooking instructions and ingredient lists (too little).

Several respondents suggest the use of standardised logos or symbols is a useful means of conveying certain types of information (eg for those with food allergy or diabetes, the presence or absence of GM ingredients, the suitability of foods for vegetarians or vegans, country of origin). Some argue that "allergy panels" separate from the ingredient list that indicate which particular allergens a food contains make the identification of ingredients which need to be avoided much clearer and avoid the need to read extensive ingredient lists.

Is any label information unnecessary or misleading?

Some find some product names themselves, and the packaging, misleading. Marketing terms like "farm-assured", "farm fresh", "farm reared", "morning gathered", "country style", "selected", "heritage", "premium", "wholesome", "healthy", "homemade", "style", "pure" and "fresh" all attract some criticism. So too do "seals of quality"; the use of claims like "sugar free" and "low sugar" which fail to give equal prominence to the presence of artificial sweetener; and claims like "low fat" or "95% fat free" when used on foods high in sugar.

Some find use of the term "lite" misleading because it can refer to anything from the colour of the product to its actual weight. A number of respondents consider that the addition of fat to skimmed milk to make it "whole milk" is deceitful. "No added sugar" can be interpreted as meaning "low sugar", which would not be true of a product naturally high in sugar (eg muesli, fruit juice). "Healthy" claims attract criticism because they are often used on vegetarian foods that contain high levels of naturally saturated vegetable oil or fat.

Some consider the RSPCA's "freedom foods" label and claims like "dolphin friendly" are meaningless because they are not explained, or that "organic" is misleading when used to imply the product is healthier. Some respondents argue that the term "organic" is misleading because it only refers to added pesticides and herbicides but ignores those contained in the water used to irrigate these products.

Other practices mentioned as misleading or confusing include describing foods as "British" when they have only been packed or processed here, and describing food as "made in EU".

Some are confused by the term "modified starch": it is not clear if this means modified by genetic or by other means. Others dislike the use of chemical names in ingredient lists.

Could any information be given elsewhere than on the label?

Some suggest labelling information for loose food sales could be provided via reference sheets made available on request either as hard copy or electronically at point of sale, possibly via automated bar code readers.

How should label claims be controlled?

The claims issue which attracted most responses was the use of terms like "low fat" and "low salt". Many respondents feel specific standards should be set for use of these terms, and for "low" and "reduced" claims generally. Some think claims like "low fat" should be banned.

Next on the list of priority concerns in this category is use of percentage fat-free claims. These are seen by many as misrepresenting foods with significant amounts of fat and large amounts of sugar as "healthy" alternatives.

Some respondents feel all claims should be subject to statutory controls, but the majority of those who refer to this issue prefer controls set out in voluntary guidance. A significant number suggest all claims should be prohibited unless independently verified and, for example, that claims for herbal "cures" should be supported by documented evidence. The general view is that the Food Standards Agency should act as referee, regulator and/or enforcer.

What sort of information should be given for food that is not sold pre-packed?

Most responses to this question mention the need for full information for food sold loose, like bread, fruit and vegetables, to be given on the shelf or in an information sheet, leaflet or display card placed in the area where the food is sold. Some suggest labelling information for loose food sales should be provided

via reference sheets available on request either as hard copy or electronically at point of sale, possibly via automated bar code readers.

For fruit and vegetables, some would like to see information about the variety and use of pesticide or herbicide sprays, and how much residue is likely to remain on the product after washing. Some want information about the date of harvesting.

For foods like fish and meat, some suggest information about the farming methods used and when it was caught/brought into the shop should be given. Its suitability for freezing should also be made clear. For some, the laying date of eggs is considered important.

The Anaphylaxis Campaign suggests an allergy code of practice for the catering industry should be developed to enable caterers to produce safe food and provide accurate information about ingredients for those with particular allergies.

BETTER FOOD LABELLING: OPEN FORUM, 2 MARCH 2000

DISCUSSION

The debate was structured around the following questions:

- What information do you want to see on labels?
- How should information be presented on labels?
- Could any information be given elsewhere than on the label?
- Should label claims be controlled?

This was not a consensus conference - the views outlined below are those of the individuals who spoke, not the whole meeting.

WHAT INFORMATION DO YOU WANT TO SEE ON LABELS?

Full ingredient listing

Fully comprehensive ingredient listing was a priority for many at the meeting. For some it was the key to everything else that people needed or wanted to know about a food. Many were surprised to hear that ingredients do not need to be labelled if they are part of a compound ingredient, such as sausages on a pizza, making up less than 25% of a product. This prevented consumers from avoiding ingredients for religious, health or ethical reasons.

There were significant and widespread concerns over the labelling of genetically modified foods. These were not limited to wanting to know about the presence of GM material in the ingredients list, but included use of GM derivatives, or GM animal feed, even if they were no longer detectable.

Ingredients of alcoholic drinks should be labelled. Current practice prevented consumers from avoiding ingredients on ethical and health grounds.

Additives used on fresh produce, such as wax coatings on fruit, should also be labelled.

Allergens

Consistent labelling of all products containing allergens was needed to enable groups at risk to avoid relevant products. Foods sold loose at retail were a particular risk. Allergy sufferers needed to know exactly what had happened during the production of a food. Reading every packet for this information was time-consuming, especially for parents with children, so a clear and obvious way of showing this information was needed.

Animal-derived products

Label information on animal-derived products was important for several groups. For some, certain animal products and additives needed to be avoided for religious reasons. Vegans avoided all foodstuffs containing products from animals, or which had been in contact with animal products, even if the quantity was small such as milk glazing on pies. Either full ingredient listings or a symbol denoting "animal free" was essential.

Production methods

Many wanted, for ethical reasons, to see improved labelling of production methods. Animal welfare was a very important issue for many people, who wanted to see compulsory label information on the method of rearing and production. Ritually slaughtered meat that entered the normal food chain, such as the hindquarters of Halal meat, should be labelled because of ethical concerns over the method of slaughter and the need for consumers to have informed choice.

Information about how foodstuffs were produced was also important for those consumers interested in fair trade and environment matters. An environmental care index on labels could reflect transport and distribution costs.

Others wanted to see labelling for post harvest pesticides, chemicals used in animal rearing and irradiated food.

Origin labelling

The importance of country of origin labelling was highlighted by a number of participants for several different reasons. Country of origin was often used as a proxy for other concerns. Some consumers wanted to be able to choose UK produced meat, for example, on welfare grounds. Country of origin was also associated with quality issues. Both the origin of ingredients and the country of processing were important. According to one participant, "country of origin should include fair trade ... it is not a geography lesson, it is about concerns over the condition of the workers and the products ... it is an ethical issue".

Information on risks and suitability for certain groups

Labelling for health risks was central to the issue of consumer choice. There were a number of such statements on labels already. The US system was considered to offer a good model. Clear labelling of aspartame-containing products as "not suitable for the under threes" was requested because of the perceived risk to young children.

Clearer storage information was needed, including more help on the meaning of "best before" dates. Some felt that the main food risk was not from genetic modification but from microbiological contamination and food poisoning. Another concern was the lack of understanding of the principles of safe storage and transport of food from store to home. Improved education and more research were needed to tackle these risks.

The need for labelling of risks from fluoride in toothpaste was also mentioned.

Nutrition labelling

Compulsory nutrition labelling of all food, including energy and fats, and especially for food aimed at children, was deemed essential. Many women were concerned over calorie intake and wanted a declaration of at least the energy levels of the product. Nutrition information was a necessary tool to tackle the growing problem of obesity. The definition of sugars on labels was criticised because sugars other than sucrose can cause tooth decay.

Nutrient content given in words as well as numbers, as in the Co-op scheme, was seen as helpful. People found it difficult to understand nutritional labels in terms of content per 100g, but portion sizes were open to manipulation by manufacturers. Better nutrition education was needed to help people take informed choices based on the nutrition content of food.

HOW SHOULD INFORMATION BE PRESENTED ON THE LABEL?

General comments were offered as well as specific ideas on the packaging of products. It was suggested that the font size of the ingredient list should be a set proportion of the size of the product name, and that mandatory information should be allocated space in proportion to the size of the packaging. All the legally required label information should be together on the front of a product pack, in a clear typeface, with a legal minimum size.

Many people do not read labels fully, especially those on low incomes or mothers with children. Therefore the priority given to label information and its presentation was very important.

Many participants favoured symbol-based labelling. Symbols were suggested for: presence (or absence) of animal derivatives; GM free; irradiated food; locally

or nationally produced foods; and animal welfare schemes. However, it was felt that symbols must be clearly explained and reliable. They were seen as a way of saving space on labels and avoiding information overload, particularly for busy shoppers. Symbols were also cited as being extremely useful in promoting products.

COULD ANY INFORMATION BE GIVEN ELSEWHERE THAN ON THE LABEL?

Several suggestions were made for alternative sources of information, including in-store leaflets, bar-code readers, and information on the Internet. If it were possible consumers would prefer to have access to an independent database of information.

Now that more people were shopping on-line, for example mothers with children, information could be targeted at people according to their interests, possibly using loyalty card data.

HOW SHOULD LABEL CLAIMS BE CONTROLLED?

Concerns were raised over a number of types of claims made on food packaging. Claims such as 85% fat free were seen to be meaningless and should be restricted.

Concern was raised that the claim GM free might not actually mean completely free from genetically modified material and was therefore pointless. A wholesaler stated that it was difficult to get guarantees for GM free material down the supply line and that there was little support for making GM free claims.

Some claims could be misleading or obscure other information about a product that could be important to consumers; for example "free range" chickens might be kept indoors under conditions not very different from battery-raised chickens. Another participant wanted to be able to distinguish between recently harvested "fresh" apples and "fresh" apples that had been stored under refrigeration, because food deteriorates during storage.

Overall, claims were felt to be necessary both to inform the consumer and to help producers market their products in the global economy, for instance for farmers to differentiate their higher animal welfare standards against products produced under lower welfare standards.

INTERNATIONAL CONTEXT

There was some concern that the UK was constrained from acting to improve labels by World Trade Organisation (WTO) rules. But countries can take action within the context of the WTO where there is a public health concern and, although UK labelling regulations must be made in the context of the UK's international obligations, those international rules could be changed. The purpose of the forum was to find out what rules consumers would like to see in the future.

CLOSING SUMMARY

There was a general demand for a broad range of information to be provided on foods. The key areas identified were:

- Production methods (including animal feed)
- · Full ingredient listing
- Advice on suitability/unsuitability for particular groups
- Information about risks to health
- Origin
- Nutrition information
- Meaningful, defined claims
- Information on environmental and fair trade issues.

This should be delivered in a statutory box containing all the information on labelling in a legible typeface, using words and symbols that are meaningful.

New technology should be harnessed, where possible, to provide added information, though not necessarily at the point of sale.

Priorities are clearly needed since people want more information but the pack size is limited. There is a need to monitor claims and have agreed criteria in some cases.

Whilst risk information could be given in some cases to support choice the Government had a clear responsibility to protect public health, and particularly to protect children and others who might not be able to make informed decisions.

The Government also had a duty to provide appropriate education to help children to become informed consumers.

There were no simple answers to the issues that the Forum had discussed but the debate would contribute to development of labelling policy in the Food Standards Agency.

LIST OF RESPONDING ORGANISATIONS

- Agricultural Christian Fellowship
- Anaphylaxis Campaign
- British Association for the Study of Community Dentistry
- British Federation of Women Graduates (Bath Association)
- Campaign for Real Ale
- Cardiff University Green Group
- Consensus Action on Salt and Hypertension
- Consumers Association
- Consumers for Health Choice
- Consumers In Europe Group
- Conwy Friends of the Earth
- Cornwall Women's Food and Farming Union
- Council of Women (Cheltenham Branch)
- Croydon Vegans
- Environment Caucus, International Sustainable Social and Economic Responses (USA)
- Farm and Animal Welfare Network (inc. Chickens Lib)
- Farm and Food Society
- Food Commission
- Friends of the Earth, Alton
- Fullers Jersey Farm Produce
- Gene Watch
- Gluten Intolerance/Coeliac Support Group, Durban SA
- Haemolytic Uraemic Syndrome Help UK Ecoli Support Group
- Keele University (Research Professor of Psychology)
- Keighley Women's Centre
- Local Authorities Coordinating Body on Food and Trading Standards
- Lincolnshire Animal Welfare Society

- Mission Impossible International (promoting greater awareness of possible adverse effects of Aspartame) and Aspartame Survivors Network UK
- National Association of Health Stores
- National Council of Women of Great Britain (Gloucester Branch)
- National Council of Women of Great Britain (Halifax Branch)
- National Council of Women of Great Britain (Hereford Branch)
- National Council of Women of Great Britain (Sevenoaks Branch)
- National Council of Women of Great Britain, (Middlesborough Branch)
- National Council of Women of Great Britain
- National Farmers Union
- National Federation of Women Institutes
- National Free Church Women's Council and Women's National Commission
- National Housewives Association
- National Kidney Federation
- Natural Law Party of Australia
- North East Vegans
- Northants Women's Food and Farming Union
- Northern General Hospital, Dietetic Department
- Plymouth Consumer Group
- Royal Free & University College Medical School
- Ryton Organic Gardens
- Scottish Consumers Association for Natural Food
- Sesame Allergy Campaign UK
- Soroptimist International
- South Devon Healthcare
- South Warwickshire Health Promotion Service
- St. Austell College
- St. Johns Allergy Clinic
- Townswomen's Guild, Gwent and Wye Federation
- Townswomen's Guild, Harlow
- Townswomen's Guild, Harrow Roxbourne (North Middlesex) Hatch End

- Townswomen's Guild, Havant and Emsworth (East Hants.)
- Townswomen's Guild, Hayling Island (East Hants.)
- Townswomen's Guild, Hythe Evening (Mid Hants. & Wilts.)
- Townswomen's Guild, Lymington (Lentune)
- Townswomen's Guild, North Durham Federation
- Townswomen's Guild, Oxford
- Townswomen's Guild, Raynes Park
- Townswomen's Guild, Rickmansworth Berry (S.W. Herts)
- Townswomen's Guild, Romford Rush Green
- Townswomen's Guild, Sidmouth Valley (Exeter)
- Townswomen's Guild, Southgate/Monkfrith
- Townswomen's Guild, Warley / Bearwood
- Townswomen's Guild, Wisbech Castle
- University of Liverpool, (Fetal and Infant Toxico-pathology dept.)
- Vegetarian Economy and Green Agriculture
- Vegan Society
- Vegetarians International Voice for Animals (VIVA)
- Vitamin UK
- Wellington Evening TG, Shropshire and Mid Wales
- Women's Institute. East Sussex Federation
- Women's Institute, Glossopdale
- Women's Institute, Nottinghamshire Federation
- Women's Institute, Pembrokeshire Federation
- Women's Food and Farming Union
- Women's Food and Farming Union Norfolk Branch
- Women's Food and Farming Union Livestock Committee / Cornwall Quality Livestock Producers Ltd
- Women's Institute, Bucks
- Women's Institute, Derbyshire Federation
- Women's Institute, Devon Federation, Environment and Rural Affairs
 Sub-committee

- Women's Institute, Gwent Federation, Llantilio Crossenny
- Women's Institute, Hampshire Federation
- Women's Institute, Hayfield and District
- Women's Institute, Leicestershire and Rutland Federation
- Women's Institute, Lincolnshire North Federation
- Women's Institute, Llandenny
- Women's Institute, Middlesex Federation
- Women's Institute, Tyne and Wear South Federation
- Women's Institute, Yarnton

ANNEX C

TOP 20 ISSUES

- 1. Presence of GM ingredients
- 2. Country of origin
- 3. Animal welfare labelling
- 4. Standard place/format for labelling
- 5. Identification of additives
- 6. Mandatory full ingredient listing
- 7. Allergen warnings
- 8. Date marking
- 9. Bigger print
- 10. Salt labelling/Fat labelling
- 11. Use of pesticides/herbicides/wax coatings
- 12. Mandatory nutrition labelling/information about calories/energy
- 13. Identification of animal derived products/ingredients
- 14. Identification of added sugar
- 15. "Low" claims thought misleading
- 16. Percentage fat free claims thought misleading
- 17. Production methods/Organic
- 18. Use of growth hormones
- 19. Other "ethical" labelling
- 20. Use of symbols