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The Guideline Daily Amount Label - Guidance or Deception

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The story of the GDA:

The ground stone for the Guideline Daily Amount labeling scheme, was laid in the leaflet "Use your label: Making Sense of Nutrition Information", published by the Food Standard Agency in 1996. Back then, the scheme was called Daily Guideline Intakes or DGI for short. The reasoning behind its creation of the label was, considerable evidence found, for consumers having difficulties interpreting labels in the EU-prescribed formats (Public health). To align with the EU's nutrition labeling directive, grams were chosen as the preferred unit of measurement. The main nutrients that consumers should focus on was found by the researchers to be; Fat, saturated fat, sodium, fiber and sugar which were chosen as the five categories (Public Health).

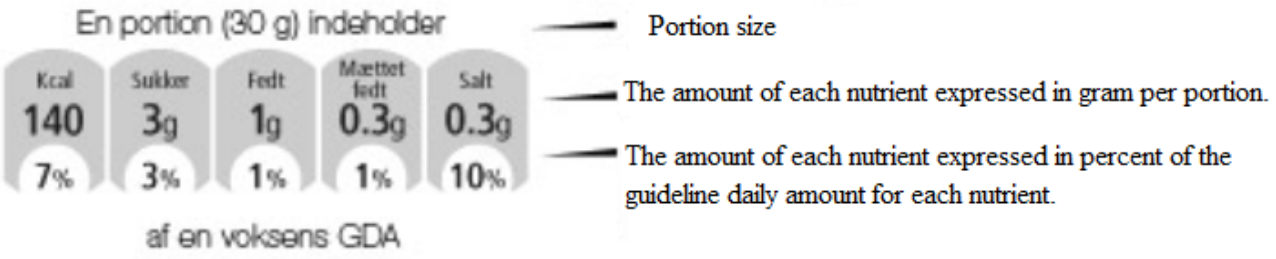
In 1998 the Institute of Grocery Distribution published "Voluntary Nutritional Labeling Guidelines to Benefit the Consumer", where the values of the DGI was used, but called GDA.

In 2005 a new technical group composed of scientific experts, and the Food and Drink Federation was created by the Institute of Grocery Distribution. The purpose of the group was to review the GDA labeling scheme. The result was a back-of-pack GDA scheme, for both genders in four age groups. The same year, the largest UK retailer Tesco, explored the possibility of placing the nutritional information on the front of the pack, and soon many others followed suit (FDF explained). FDF and CIAA, who represent the food and drink industry in Britain and Europe respectively, have helped form the current GDA label. The CIAA is better known as Food-Drink-Europe.

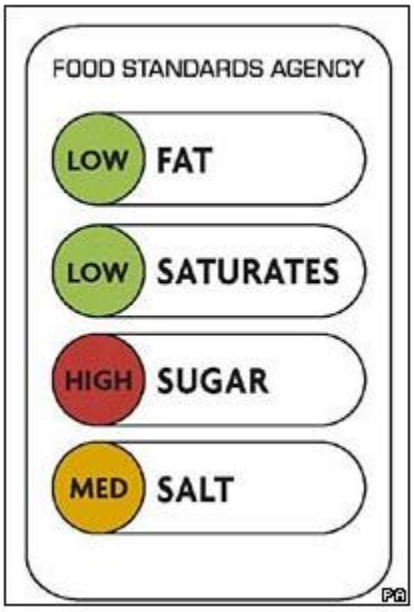
The European Union has adopted the GDA label as a voluntary system for companies to use. It is placed on the front of the food package. The GDA label shows the number of calories and grams of sugars, fat, saturated fat and salt per portion of food, and expresses these quantities as a percentage of the Guideline Daily Amount.

Types of nutrition labels:

Nutrition labeling can be divided into two main categories, descriptive and normative labels. Some labeling schemes utilize the qualities of both categories, and are called hybrid labels. The descriptive labels communicate through numbers and words. They try to communicate factual information about the product to the consumer. A higher level of insight and interest in nutrition is required by the consumer, to decipher the descriptive labels relative to the normative labels (Thomas Boysen Anker). The traditional GDA label is a good example of a descriptive label.



The GDA label contains much information relative to the more simplistic normative labels. The nutrient information is provided by numbers and words. Both the amount of nutrients in gram per portion, and the amount of each nutrient expressed in percent of the guideline daily amount, relative to the portion size, is presented in a colorless tangle. Normative labels, on the other hand, prefers to communicate through colors or symbols. They are more simplistic in their appearance and tend to communicate simple information (Thomas Boysen Anker). The information provided by normative labels contains a specific assessment. This assessment could be whether the level of a nutrient in a given product is high or low. The simple Traffic light label is a good example of normative labels.



Source: (Simple traffic)

The simple Traffic light label as seen above uses no numbers. It delivers its message using colors and simple wording. Embedded in the words; low, medium and high, is a specific assessment of the products nutritional values. The color coding of the label assists the consumer in making a healthy choice at a glance.

Series of issues:

The GDA label we know today is organized by the FDF and CIAA together with Coca-Cola, Danone, Kellogg's, Kraft, Mars, Metro, Nestlé, Orangina, PepsiCo, Tesco and Unilever. CIAA's mission is to represent the food and drink industries' interests at the level of European and international institutions. Whether the driver behind the project can be attributed to industry speculation in industry rights, a wish to heighten society health, market transparency or all of the mentioned- is a natural question in light of the initiators of the project. In the European country of Denmark, the GDA label has received massive criticism by Danish Dairy Board, Danish Heart Foundation, the Federation of Retail Grocers in Denmark, the Danish Agricultural Council, the Danish consumer Council, Danish Cancer Society and the Danish Diabetes association amongst others. The commonality of the criticism of the GDA label is that, it misleads the customers by making unhealthy foods appear healthy.

Purpose:

The purpose of this dissertation is to investigate the misleading properties of the GDA label. To assess the positive and negative attributes of the label in comparison to other labels, and to offer suggestions on design changes, that can lower the risk of deception. This road laid with goals will lead to the answer of the thesis' main question:

Is the GDA label guiding or misleading the average consumer?

Methodology:

In the light of this thesis' practical basis and its quest for tangible solutions to the provided series of issues, the theoretical standpoint has received low priority.

Three different types of analysis will be undertaken in this thesis. The first analysis is a semantic case study of Kellogg's Coco Pops. The second is a retrospective focus group interview, and the third analysis is a comparative analysis of the GDA label and the Traffic light label.

The case of Kellogg's Coco Pops:

Since the scope of this thesis revolves around misleading nutrition labels, I have found it necessary to research a case in which, a product has been reported as misleading the consumer, in relation to its GDA label. After providing a review of the case in detail, I assess the semiotic cocktail of the

product, give a critique of the case history and investigate if the company has followed the notice of injunction given by The Danish Veterinary and Food Administration. Lastly recommendations on heightening the transparency of the product are given on the basis of the case history.

Focus group interview:

I have chosen to use a focus group interview as a retrospective analysis. Using a qualitative research method for retrospective analysis occurred to me as the most suitable form. The reason being, that I as a moderator have the opportunity to present physical objects in plenum. Furthermore, the role of moderator lets me steer the discussion in a direction that, can verify or discredit assumptions made in the second part of the literature review, pertaining to the negative criticism of the GDA labeling scheme.

Comparative analysis:

Conducting a comparative analysis of two labeling formats with different properties, allows me to asses each element of the two labels, their attributes and their capacity for misleading the consumer in relation to each other. In this way, the analysis should yield the best elements of the two labels, on which conclusions can be drawn on transparent label communication.

Reflection on methodology:

I chose to present and analyze the case of Kellogg's Coco Pops as it relates directly to the topic of this thesis. I find that the review of the case history yielded useful information, on the grounds of which, conclusions are drawn in both the Danish Veterinary and Food Administration and the Food and Veterinary Complaints Board. The following analysis of the product's semiotic cocktail yielded only few recommendations to heighten the transparency. It is possible that another product could have given way to a longer list of recommendations. I do not regret the choice of product, as the review and subsequent analysis of the product proved to interact well, with the other two analyzes undertaken in this thesis.

The results of the focus group interview largely supported the mainstream criticism in the literature review. This worried me as it could indicate that I in the role as moderator, helped form the opinions of the focus group participants. After transcribing the focus group interview, see annex 1, it was clear to me that some mistakes had been made, but that the results of the interview had not

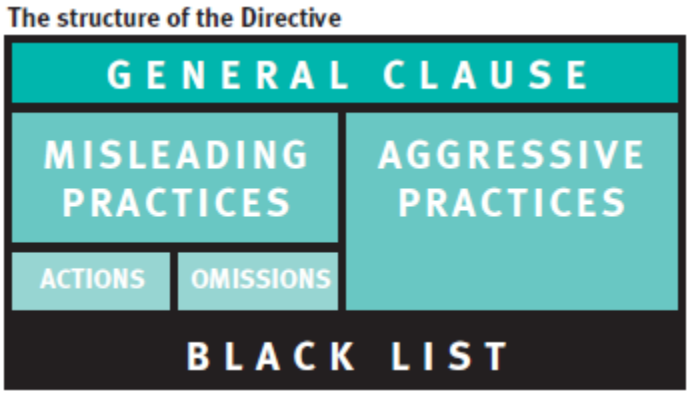
been tainted. In hindsight, one or two additional focus group interviews would strengthen the conclusions drawn upon relating the interview to the other analyzes and the literature review.

The comparative analysis yielded very useful information on individual components of both the GDA label and the traffic light label. The choice of using the traffic light label was on the button and helped form the basis for suggested design changes to the GDA label, because it showed to encompass many qualities that the GDA label lacks.

Misleading the average consumer:

The Unfair Commercial Practices Directive:

To remove internal barriers in cross-border trading and develop the internal market, the European Union has adopted the Unfair Commercial Practices Directive. The directive gives a uniform view of unfair commercial practice, by replacing member states' existing general clauses in the area, thus providing a single European reference point, to witch commercial practices are allowed and which are not.



Source: (Unfair Commercial Practices Booklet)

The directive consists of two main categories; misleading practices and aggressive practices. Furthermore misleading practices are divided into actions and omissions.

Actions: In the category of misleading practices, actions are the activities traders carry out in both the promotion and the sale of their products. The practice is considered misleading if it contains false information (DIRECTIVE 2005/29/EC), is likely to deceive the average consumer or is likely to cause the average consumer to take a transactional decision that he would otherwise not have

taken. To deem a business practice action misleading, there is no need to prove a financial loss, the possibility of deception alone can be misleading (Unfair Commercial Practices Booklet).

Omissions (DIRECTIVE 2005/29/EC): A trader must provide information the consumer needs to make informed choices. It is misleading to omit hide or provide material information in an unclear, ambiguous or untimely manner. It is also misleading to fail to identify the commercial intent of the practice if not apparent.

Aggressive practices cover harassment, coercion, physical force and undue influence that significantly impairs or is likely to significantly impair the average consumer's freedom of choice, and thereby is likely to cause him to take a transactional decision that he would not have taken otherwise (DIRECTIVE 2005/29/EC).

'Transactional decisions translates to any decision a consumer makes, concerning whether, how and on what terms to purchase, make payment in whole or in part for, retain or dispose of a product.

In addition to the guidelines above, the Unfair Commercial Practices Directive contains a so called Black List. This list consists of 31 commercial practices which are in all circumstances considered unfair (DIRECTIVE 2005/29/EC). Penalties for infringements are to be laid down by Member States, theses penalties must be effective, proportionate and dissuasive (DIRECTIVE 2005/29/EC).

The average consumer

The Unfair Commercial Practices Directive takes the average consumer as a benchmark. This is done to permit effective use of the protections contained in the directive, in line with the principle of proportionality[1]. Interpreted by the European Court of Justice, the average consumer is reasonably well informed and reasonably observant and circumspect, taking into account social, cultural and linguistic factors (DIRECTIVE 2005/29/EC). In addition the benchmark is also aimed at particularly vulnerable groups of consumers. If a commercial practice is aimed at a specific target audience, it is desirable that the effect of said commercial business activities be assessed, from the perspective of the average member of the specific target audience. The average consumer benchmark used in the directive is therefore not a fixed size, but ideally fluctuates according to the characteristics of the consumer group. In this way; children' circumspection will not be equated with adults´. The directive identifies vulnerable consumers as those more exposed to a product or

[1] A public authority may not impose obligations on a citizen except to the extent to which they are strictly necessary in the public interest to attain the purpose of the measure.

commercial practice, because of their mental or physical infirmity, credulity or age as mentioned above. Infirmity refers to sensory impairment, limited mobility and other disabilities, while credulity covers groups of consumers who may be more ready to believe specific claims. It is the responsibility of the national courts to exercise their own faculty judgment to determine the reaction of the average consumer, with regards to the case-law of the European Court of Justice (DIRECTIVE 2005/29/EC).

There has been some critique of the average consumer benchmark system. Critics argue that the average consumer test focuses more on additional liberalizing of the free market, than on protecting vulnerable consumers. It is also argued that a new seller can only inter the market with confidence, if he knows which rules and regulations must be met in advance, when interacting with a potential consumer. Lastly it has been suggested that the majority of consumers are neither average nor vulnerable (Rossella Incardona 2006).

Literature review:

The literature review is divided into four sections. The first section is called EFSA's advice, and deals with the European Food Safety Authority advice on the guidelines for nutrition labeling.

The second section is- review of existing studies. This segment deals with the studies revolving around nutrition labeling. The section will present a short review of 6 studies that directly reference the GDA labeling scheme, and which' results pertain to the aim of this thesis. The 6 studies will be reviewed, to correlate the findings and reflect on the results of said studies. Each study will be explained in terms of study essentials, key findings and a short literature critique. Lastly this section will review a seventh study in more depth, as it pertains directly to consumer comprehension of the GDA label, and provides well founded statistical data on this.

The third part of the literature review is called criticism of the GDA labeling scheme. This section will investigate the criticism put forth in two reports, one British and the other one Danish. The two reports have been chosen to represent the mainstream criticism of the GDA label. The reports have been chosen to represent the mainstream criticism because of wide and massive support underlying the reports. Each point of critique will be put forth and their validity assessed.

The last section of the literature review is called the positive attributes of the GDA label. The views presented in this section are mostly derived by industry and the CIAA.

EFSA's advice:

Today the front-of-pack GDA scheme includes; energy, total fat, saturated fat, carbohydrates, sugars and salt.

> *To discourage over-consumption, particularly amongst those with low energy requirements, it was agreed that the GDA values currently used for women be used as the "All Adults" figure. This also prevents the confusion of employing a new set of values based on the average GDA between males and females*

Source: (FDF – The facts)

As seen above, the reference intake is no longer divided in gender or age groups, instead they refer to the optimal intake of a moderately active woman of forty, which is lower than for men. In 2009 the Panel on Dietetic Products, Nutrition and Allergies under the European Food Safety Authority, was requested to review and advice on labeling reference intake for each of the categories on the GDA label. The All Adults figure is found by the European Food Safety Authority to be more consistent with dietary advice for the general population on avoiding excess intakes of energy and nutrients (EFSA).

Findings by EFSA' Panel on Dietetic Products, Nutrition and Allergies

The European Commission has adopted a proposal for a Regulation of the European Parliament and the Council on the provision of food information to consumers (EFSA). The regulation is meant to provide the basis for a high level of consumer protection in relation to information on food. With special regards to food labeling and to the functionality of the internal market (Com2008). The main proposed change to nutrition labeling, is that information should be provided on energy, fat, saturates, sugars, salt and carbohydrates, on most of processed products. The proposal includes that the information should be expressed as a percentage of a reference intake per 100g, 100mL or per portion. Member States requested the European Food Safety Authority to review the proposed reference intakes. This has been done by the EFSA' Panel on Dietetic Products, Nutrition and Allergies. Here are the results:

Energy:

The reference intake of energy is 2.000 kcal. Previous reference intake has been 2000-2070 kcal for women and 2500 kcal for men. Although the recommended intakes fluctuate depending on age, sex, body size and average physical activity levels, the European Food Safety Authority has no objections to the All Adults figure (EFSA). The CIAA recommends that if companies choose to provide only one GDA value, a sentence should be added, indicating that active men have higher requirements and young children lower (CIAA-Rationale).

Fat:

The basis for the calculation of GDA values for total fat is 30% of the total referenced energy intake. Saturated fat is 10 % of the total energy recommendations. The calculations for reference intake of 2.000 kcal are;

Total fat: $\frac{30 \cdot 2000}{9} = 66.7 \approx 70g$

Saturated fat: $\frac{10 \cdot 2000}{9} = 22.2 \approx 20\text{g}$

The conversion factor used by CIAA is 9 kcal per gram, in alliance with the EU Nutrition Labeling Directive (CIAA-Rationale). The EFSA finds that both the reference intake for total fat and saturated fat, are consistent with dietary advice for the general population (EFSA).

Sugars:

The proposed reference intake for total sugars is 90 g which corresponds to 18 % of the energy in a 2.000 kcal diet. Total sugar consists of both indigenous and added sugars. The European food industry and some regulatory authorities, currently use reference intake values for total sugar as 90 g for women and 110-120 g for men. This corresponds to 18-19 % of the energy in a 2.000 kcal diet. It was found by the EFSA that there are no generally recommended intakes for total sugars, but that an upper limit has been recommended for added sugars by several authorities, generally as 10 % of the consumed energy. The EFSA argue that the recommended daily intake of 400g fruit and vegetables and three portions of dairy products amount to 45 g of indigenous sugars, which is half of the referenced intake for total sugars. The EFSA is assuming that the latter half of the recommended intake is added sugar, which corresponds to 9 % of the energy in a 2.000 kcal diet. The observed range of average intake of total sugars in adults in European countries varies from 17

to 26 %. With this in mind, the EFSA finds that the proposed labeling reference intake for total sugars of 90g is in line with the recommended upper limit of intake of added sugars (EFSA).

Salt:

The recommended intake of salt in European countries is between 5 and 8g daily. The average salt intake in the European countries is a bit higher; 8 – 11g daily. The proposed reference intake for salt in the GDA label scheme is 6 g. The EFSA Panel considers that, the proposed labeling reference intake for salt at 6 g is consistent with recommended intakes and dietary advice for the general population (EFSA).

Carbohydrates:

The labeling reference intake for carbohydrates is proposed at 230 g which corresponds to 46 % of the energy in a 2.000 kcal diet. The recommended limit of total carbohydrates for the general population in EU countries is generally 50 – 55 % of the energy in a 2.000 kcal diet. The average carbohydrate intake of adults in EU countries is 38 – 56 % of the energy in a 2.000 kcal diet. On these grounds, the Panel considers that a labeling reference intake of 260 g corresponding to 52 % of the energy in a 2.000 kcal diet would be consistent with dietary advice. Thereby the Panel proposes that the reference intake is raised by 30 g (EFSA).

All in all the EFSA finds most of the reference values to be in line with dietary advice. Only the reference for carbohydrates is adjusted. These values create the backbone of the GDA label, by regulating the foundation on which the information on the label is build.

Review of existing studies:

Numerous studies have been conducted on the effects of food labeling. This is a short review of 6 of the studies that directly reference the GDA labeling scheme, and which' results pertain to the aim of this thesis. The 6 studies will be reviewed, to correlate the findings and reflect on the results of said studies. Subsequently a seventh study will be reviewed in more depth, as it pertains directly to consumer comprehension of the GDA label and provide well founded statistical data on this.

Study essentials – testing effectiveness:

The first study that I present findings from is by Feunekes et al, named; "Front-of-pack nutrition labelling: Testing effectiveness of different nutrition labelling formats front-of-pack in four

European countries (Testing effectiveness 2006). The report presents findings from two studies; evaluating different labeling formats on consumer friendliness and measure the effects of the different labeling formats on decision-making. The combined total number of respondents in the study is 2.406 men and women distributed on four European countries; Italy, United Kingdom, the Netherlands and Germany. Included in the study are several labeling schemes; Healthier choice tick, Health protection factor, Stars, Smileys, Multiple traffic light, Wheel of health, Multiple choice tick and Guideline daily amount. Of these labeling schemes GDA and Wheel of health are examples of the more detailed labels (Testing effectiveness 2006).

Key findings:
The overall consumer friendliness was composed of; comprehension, liking and credibility. In the test of comprehension of formats, the different labels were ranked on a 5-point scale. The GDA scored lowest on means ranging from 3.8 to 4.4, though it should be said that on average participants found all nutrition labeling formats easy to understand.

In the two tests of liking, means ranked from 3.1 to 3.5 and 3.2 to 3.6 on a 5-point scale. In this test the GDA label ranked in at number one and two respectively. It was concluded in the study that on average, participants reasonably liked all the formats.

As for credibility of the labeling formats, it was found that official endorsements strongly increase the credibility of the individual labels. This indicates the importance of organizations in the area of health and nutrition. It was made clear in the study, that consumers expect one nutrition labeling format across different food products in different categories.

The labeling in general increased the perceived healthiness of the healthier products, and slightly decreased the healthiness of the less healthy products. No consistent and interpretable pattern was found between labeling formats, although significant differences were found. Participants intended to slightly increase their consumption of healthier products and to decrease their consumption of less healthy products overall.

It was found that participants needed almost 10 seconds longer to evaluate products equipped with the GDA scores, than simpler labels (Testing effectiveness 2006).

Study critique:

The authors of this stydy: Gerda I.J. Feunekes, Ilse A. Gortemakera, Astrid A. Willems, Rene´ Lion and Marcelle van den Kommer, are all employed by Unilever. Unilever is among the companies who introduced the GDA label. This gives rise to a possible conflict of interest, since the researchers are studying labeling schemes that their employer has helped to introduce.

Study essentials - Impact of different food label formats:

Ingrid Borgmeier and Joachim Westenhoefer's study from 2009; "Impact of different food label formats on healthiness evaluation and food choice of consumers: a randomized-controlled study" was conducted with 420 subjects from Germany. Included in the study were two different versions of the GDA label. One was the traditional monochrome label and the other was a colored GDA label, colures indicating healthy and less healthy amounts. Furthermore a multiple traffic light, healthy choice label and a "no label" was used. The healthy choice label is also referred to as a simple tick condition. The test was divided into two sections. The first part of the study consisted of 28 pair-wise comparisons of foods from different food groups, where respondents were to pick the healthier food. In the second part of the test the respondents got tasked with selecting food portions from a range of foods to compose a one-day's consumption (Label formats on healthiness).

Key findings:
In the first part of the test, of all the different labeling schemes, the traffic light label yielded the highest average of 24.8 correct answers out of 28. The worst result was found for the "no label condition". The usage of both the monochrome GDA and the colored GDA showed that no significant deferens was found between the two. This study also cross correlated their results with both sex and education level (Label formats on healthiness).

Using sex as the second factor showed, that men had significantly higher expected consumption of grams; fat, saturated fat, protein, sugar, carbohydrates and sodium. These higher intakes did not depend on or vary between labels significantly, indicating that the gender differences were present for each label.

Using education level as a second factor showed that, when using the traffic light or colored GDA condition, higher sodium intake was associated with higher education, but with lower education level in the simple tick condition. There was found no significant influence of education level on

the number of correct decisions. Furthermore, the study found that normal weight subjects had higher energy percentage from carbohydrates than overweight subjects. The lowest energy percent from carbohydrates was found in the collared GDA condition and highest in the "no label" condition.

In the second part of the test all groups had an average daily intake for fat, saturated fat, sugar and sodium above the recommendations for daily consumption. Energy intake did not differ significantly between label formats in this part of the test.

As mentioned above, the traffic light format yielded the highest number of correct choices, but the difference between the label formats was only moderate. The traffic light signpost had as the highest 24,8 of 28 right pair-wise comparisons, compared to the lowest 20,2 of 28 for the "no label" condition.

Study critique:

It should be noted that this study only used German respondents, which in turn reflects the results.

Study essentials - The Influence of Nutrition Information:

The third study is from 2010 by Hassan et al. named; The Influence of Nutrition Information on Choice: The Roles of Temptation, Conflict and Self-Control. It sets out to prove or disprove four different hypotheses (Hassan 2010).

H1: High GDA values will have a direct effect of reducing the tendency of consumers to choose the cake than moderate GDA levels or when no GDA information is presented.

H2: High GDA levels will result in a weaker positive impact of temptation on the tendency to choose the cake than moderate GDA levels or when no GDA information is presented.

H3: High GDA levels will result in a weaker positive impact of conflict on the tendency to choose the cake than moderate GDA levels or when no GDA information is presented.

H4: High GDA levels will result in a stronger negative impact of self-control on the tendency to choose the cake than moderate GDA levels or when no GDA information is presented.

The experiment tested 299 female consumers in the United Kingdom, and investigated the impact of nutrition information on their choice of cake. All the subjects in the study were randomly

assigned to one of three groups. Subjects were asked to choose whether they would have a chocolate cake in a café when taking a break from shopping. The first group was the control group whom only saw the color photograph of the cake. The second group, called the moderate GDA values group, saw in addition to the cake also the real GDA values of the cake. The third group, called the higher GDA values group, was presented with real GDA information on cakes with a higher calorie and sugar content.

Key findings:

H1 was partially supported. The results show that of the control group 54% said they would choose to eat the cake. Of the moderate GDA values group 66% of the subjects would eat the cake. In the higher GDA values group 49% would eat the cake. The difference in proportion between the control group and the moderate GDA group, and the difference in proportion between the control group and the higher GDA group was not found to be statistically significant. On the other hand, the difference between the moderate and high GDA groups was significant.

H2 was not supported. No significant moderating effect of GDA on the relationship between temptation and choice was found. The cognitive engagement with GDA information did not impact the influence of temptation towards an impulse to consume the cake.

H3 was fully supported. The study indicates that high levels of conflict are associated with a greater tendency to eat the cake. Also, GDA information showing high levels of sugar and calories weakened this relationship.

H4 was fully supported. The tendency to choose the cake was greatly suppressed with high levels of self-control and presence of high GDA information. GDA labels showing high levels of sugar and calories, strengthened self-control to suppress the impulse to consume (Hassan 2010).

Study critique: It should be noted that all the respondents in the study were British, and that all the respondents were women. Essentially this study's results pertain to British women.

Study essentials - Food Labeling Research:

The fourth study was commissioned by the Irish Heart Foundation, Irish Cancer Society and National Youth Council and conducted in September 2010. The purpose of the study was to test the

monochrome GDA label against the color coated GDA label. The colors used were red, yellow and green, each accompanied by the words high, medium and low respectively. This was done to examine which of the labels was easier for consumers to use and understand. The study was conducted by face to face interviews among a representative sample of grocery shoppers in a selection of locations. A total of 400 interviews were conducted. 3 product categories were tested; crisps, cereal and lasagna (Food Labelling Research 2010).

Key findings:

55% of the subjects in the study identified the colored GDA label as more informative, regarding nutritional content, when shown a picture prompt. Only 29% found the monochrome GDA label the same. Consumers were significantly more likely to claim the capability to compare the health of products at a glance using the colored GDA versus the monochrome GDA label. Moreover, consumers were significantly more likely to claim that they are likely to use the colored GDA in the future, than the monochrome GDA (Food Labelling Research 2010).

Subjects using the colored GDA label were significantly more likely to determine the correct level of fat, saturated fat, sugar and salt. Nevertheless, no significant difference was found when the subjects were asked to identify the two healthier products out of four. About 59% of the subjects testing either the monochrome or colored GDA correctly identified the healthier versions.

It was discovered that a high level of confusion was present when the words; high, medium and low was deleted from the colored GDA label. More than a third of the subjects incorrectly believed that green meant a high level of nutrients. Equally many incorrectly believed that red meant a low level of nutrients. Furthermore the majority of subjects, who were familiar with GDA, incorrectly thought that GDA meant daily allowance of a nutrient.

Study critique: The locations of sampling are not disclosed in the study. But it is clear that the sampling was conducted in Ireland. , The Irish Heart Foundation, the National Youth Council of Ireland and the Irish Cancer Society issued the study, which in turn was conducted by RED C research and marketing.

Study essentials - The Impact of Health Claims:

Journal of Public Policy & Marketing published in 1999; The Impact of Health Claims on Consumer Search and Product Evaluation Outcomes: Results from FDA Experimental Data – by Roe et al. The study gathered data from 1.403 primary food shoppers in face to face interviews across the USA. The respondents were presented with different well known products with the brand name removed, and asked a series of predetermined questions (ROE 1999).

Key findings

It is suggested by Roe et al, that nutrient content and health claims have similar practical impact on information processing and product evaluation. The presence of a health claim is associated with a greater probability of customers limiting their search to the front of the pack, instead of seeking out information in more detail on the nutrition facts panel on the back of the package. This is also the case for nutrient-content claims, just not as strongly. As claims induce truncation, it is also found that claims and truncation independently contribute to a positivity bias and induce a halo effect (ROE 1999).

Study critique: The study used only respondents from the United States of America, and did so from 8 different states. Country differences are not taken into account in this study, as it pertains only to American consumers.

Study essentials - Are Some Comparative Nutrition Claims Misleading:

Journal of Advertising published in 2000 a study by Andrews et al. named; "Are Some Comparative Nutrition Claims Misleading? The Role of Nutrition Knowledge". The study included 366 primary food shoppers interviewed in three different locations across USA; Boston, Chicago, and Los Angeles. Andrews et al, tests the effect of different types of nutrition claims, to examine whether consumers form potentially misleading generalizations, from comparative nutrient content claims in advertising. Nutrient content claim disclosure is divided into three types; Absolut disclosure, Relative disclosure and evaluative disclosure. The first type displays the absolute information only, by showing the total amount of nutrients, for any nutrient required by regulation. Relative disclosure, like the GDA label, adds information on the recommended daily value level and percentage of daily value of the nutrient. Evaluative disclosure specifies the per-serving level of the disclosed nutrient and if it is high relative to FDA standards (Andrews 2000).

Key findings:

It is found by Andrews et al, that all three types of disclosure are significantly more effective in reducing misperceptions of sodium content, blood pressure risk, heart disease risk and overall healthiness, than a no disclosure condition.

The evaluative disclosure results in higher perceived sodium content than the absolute and the relative disclosure. It is furthermore suggested by Andrews et al, that providing an evaluation of the nutrient levels, may be more effective with consumers than those providing relative and absolute disclosure.

Study critique: Do to the sample restriction of using only primary food shoppers, 68,5% of the participants were female. Since the population of the USA is nearly equally divided on the two genders, the study provides a measure of the primary shoppers rather than the entire adult population.

Summary:

After reviewing the existing studies, it has become clear that consumers expect the same nutrition label format across different products (Testing effectiveness 2006). This is consistent with the earlier mentioned directive 90/496/EEC which gives a uniform approach to food labeling in the European Union. Furthermore it seems that the presence of a nutrition label, whether it is absolute disclosure, relative disclosure or evaluative disclosure, is preferable to a no label condition (Andrews), although evidence suggests that the effect of a label in pair-wise comparisons, does not yield as large an effect as could be expected (Borgmeier). Providing an evaluation of the nutrient levels, by illustrating whether the level of specific nutrients are high, may be more effective with consumers than those providing relative and absolute disclosure (Andrews). It seems that the GDA label is one of the most liked label formats (Testing effectiveness 2006) and when a GDA label is showing high levels of sugar and calories, self-control is strengthened to suppress the impulse to consume (Hassan et al.)

The presence of a health claim is associated with a greater probability of consumers limiting their search to the front of the pack, instead of seeking out information in more detail on the nutrition facts panel on the back of the package (ROE). This illustrates the importance of easy decodable

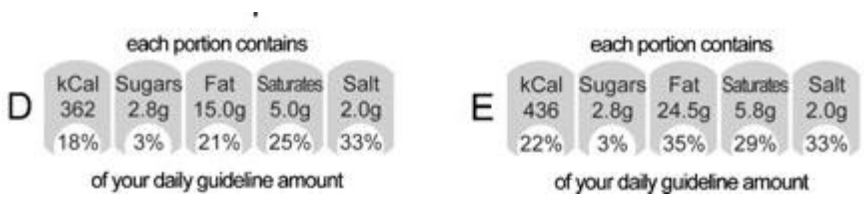
labels. The truncation resulting from the front of pack labeling and health claims independently induce a halo effect (ROE).

Of all the label types tested in the literature, the GDA label is not the easiest to understand. GDA scored lowest in the comprehension test, with means ranging from 3.8 to 4.4. Participants needed almost 10 seconds more to evaluate products displaying the standard GDA scores, than the simpler labels (Testing effectiveness 2006). 55% of the subjects in the study identified the colored GDA label as more informative, regarding nutritional content, when shown a picture prompt. Only 29% found the monochrome GDA label the same (Food Labelling Research 2010). In fact, subjects using the colored GDA label were significantly more likely to determine the correct level of fat, saturated fat, sugar and salt. Although the colored GDA was found to be more informative relative to the monochrome GDA, when only granted a short time to estimate a product, great confusion arose when the words; high, medium and low was deleted from the colored GDA label (Food Labelling Research 2010).

Comprehension of the GDA label:

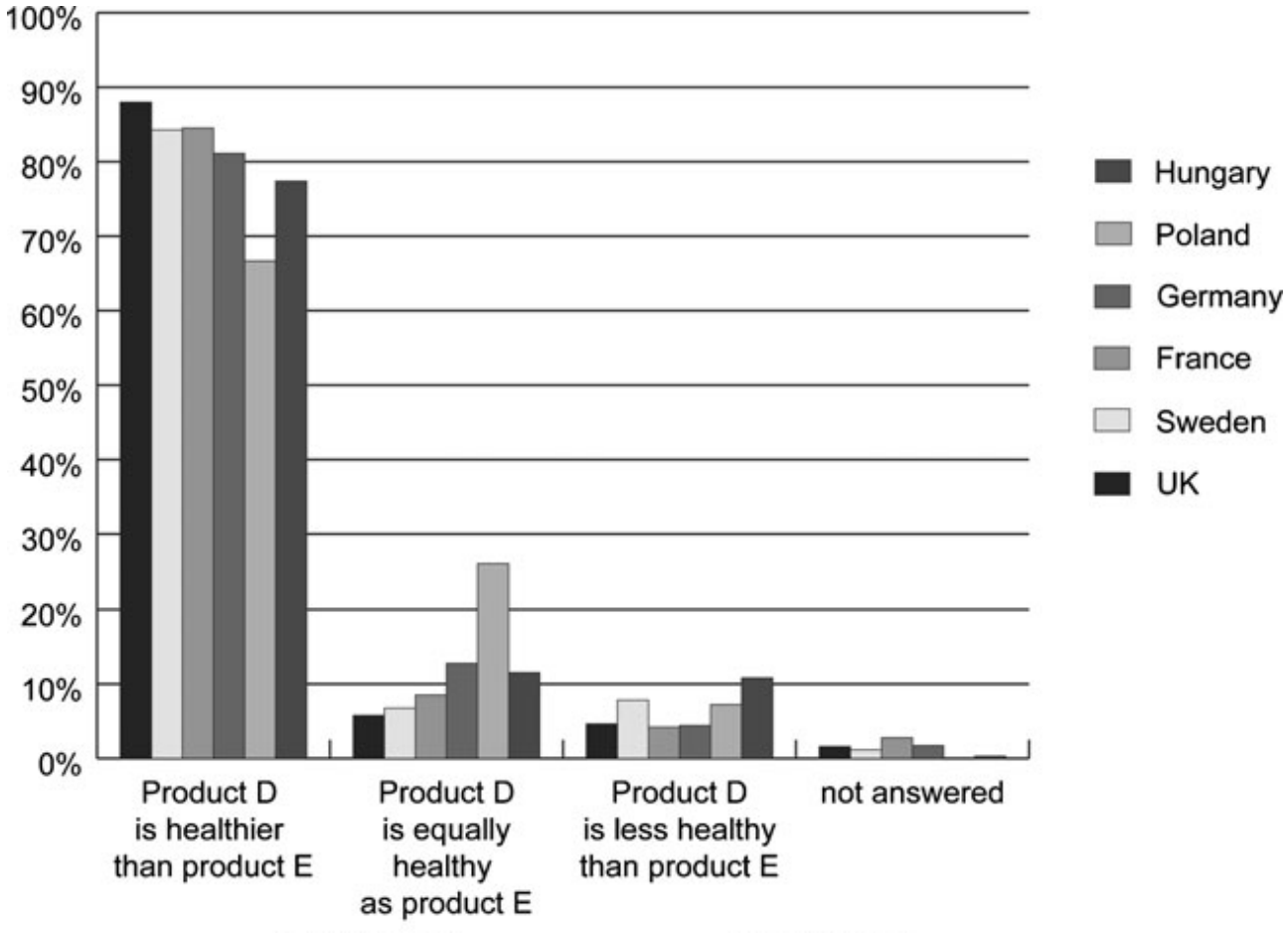
The study from 2009 named "Use and understanding of nutrition information on food labels in six European countries, is conducted by Grunert et al (EUFIC 2009). The study investigates the usage and comprehension of the GDA front of pack label in six European countries; Germany, the United Kingdom, Sweden, France, Hungary and Poland. The methodology of the study comprises in-store observation, in store interview and an in-home questionnaire. This segment will provide an overview of the findings pertaining to the comprehension of the GDA label.

Respondents were asked to identify the healthier product of two, by only looking at the GDA label for the products. The two GDA labels looked as follows.



Source: (EUFIC 2009)

While being identical in sugar and salt, the two labels differentiate in kcal, fat and saturated fat. Results from the test are seen below.

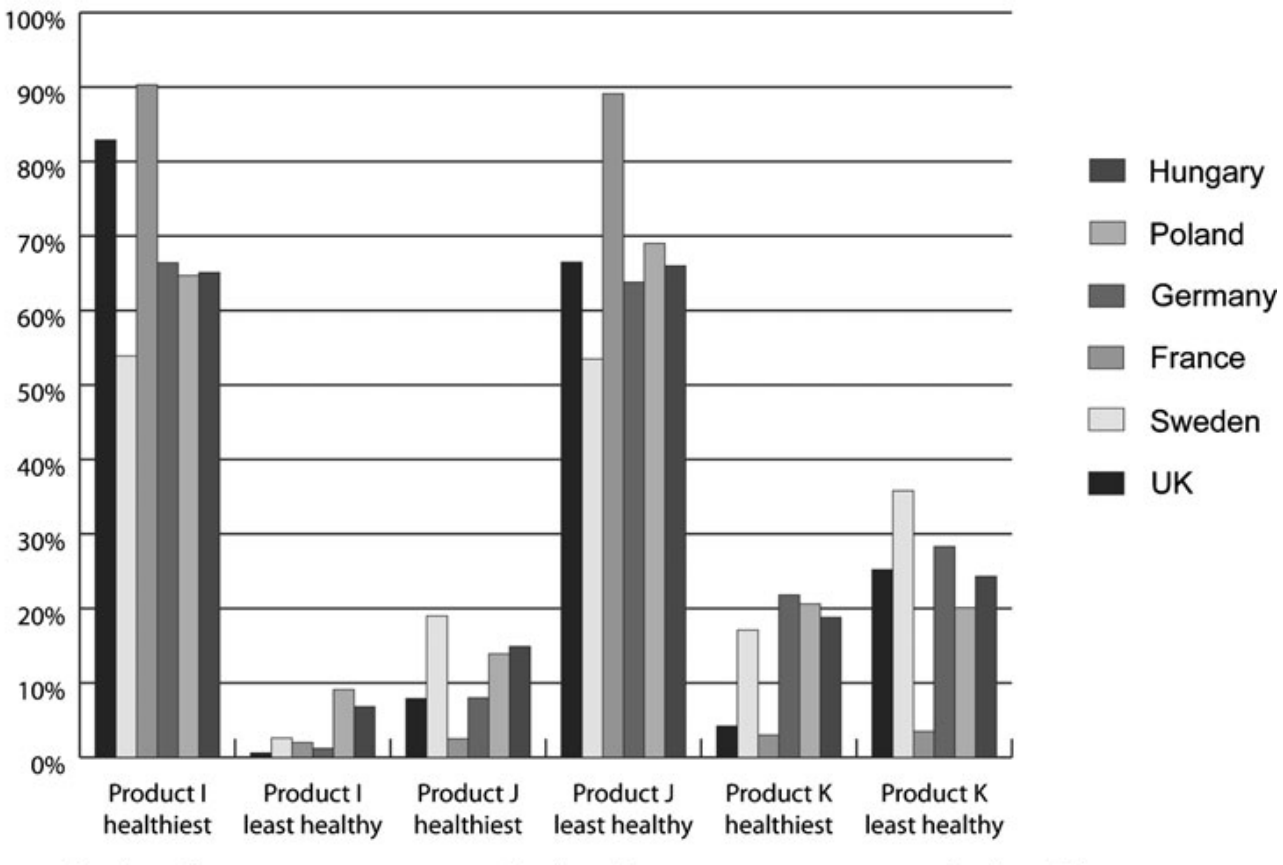


Source: (EUFIC 2009)

As seen in the graph above, by far most respondents were able to identify the healthier product by only looking at the GDA label. The next test was heightened in complexity, as the respondents now was asked to identify the healthiest and the least healthy of three products, still by only looking at the GDA labels.

Source: (EUFIC 2009)

The three GDA labels show the same level of Sugar. Label K differentiates from label I only in their reference of saturated fat, while label J differentiates in kcal, fat and salt.

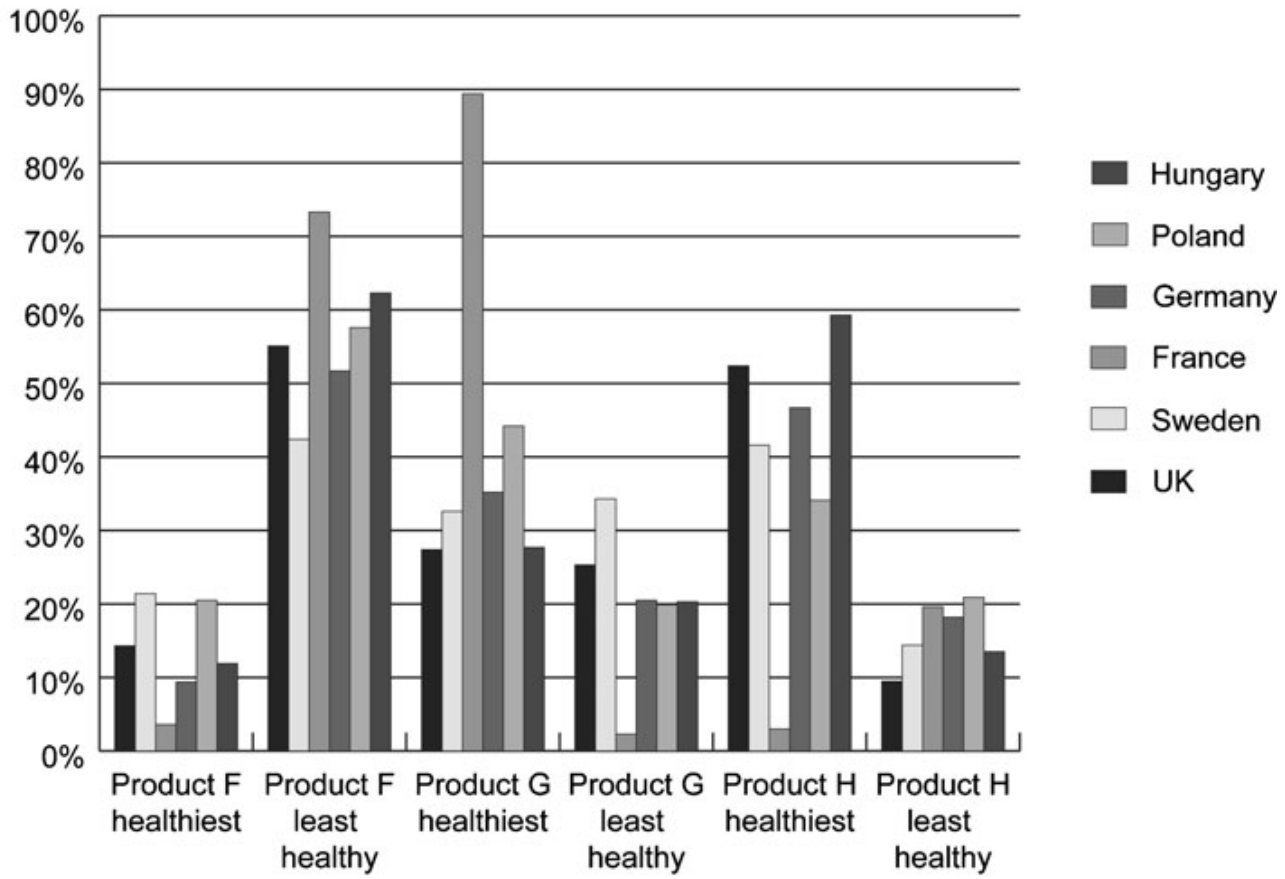


Source: (EUFIC 2009)

The results of the test seem to indicate a slightly wider distribution of answers, while still clearly signaling a consensus. Respondents largely agreed that Product J, where the GDA label showed a higher content of calories, fat and salt, was the least healthy of the three. It is also clear that most respondents correctly identified product I as the healthiest. In the third test of consumer's ability to correctly identify the healthiness of products, solely from looking at the GDA label, complexity was heightened again.

Source (EUFIC 2009)

The labels G and H only differentiate on salt and saturates, while label F represents a product higher in calories and fat.



Source: (EUFIC 2009)

The results from the third test clearly show a wider distribution of answers than the previous tests. While most respondents recognized product F, which is higher in calories and fat, as the least healthy, a greater uncertainty is associated with the healthiest product. This reflect the respondents' weighing of saturates and salt. The vast majority of the French respondents identify product G as the healthiest, as clearly demonstrated in the graph above. The reason for this could very well be, that the information on saturates is not included in the French GDA label. This illustrates the importance of uniform labeling. If consumers are not presented with the same information, it cannot be expected that they will reach the same conclusion.

The study by Grunert et al, also investigated how many shoppers actually looked at nutrition information. This was done across six different product categories; breakfast cereals, carbonated soft drinks, confectionery, ready meals, salty snacks and yoghurts. The results show that 16.8% of consumers had looked at the nutrition labeling across the six product categories, but whether the nutrition label had an influence on consumer behavior is unclear. The study goes on to suggest that the lack of use is more prevalent than the lack of comprehension. Which in turn leads to the

conclusion that usage of nutrition labeling, not only is a question of understanding the label, but also motivation (EUFIC 2009). It is suggested that the large degree of motivation, in the form of public debate on healthy eating in the United Kingdom, explains why respondents here showed a higher usage of nutrition labeling than the other countries.

Study critique: The study investigates consumer's comprehension of the GDA label, in inter category comparisons. The study does not take changing portion sizes into account. The study's results therefore pertain to consumer comprehension of the GDA label, where the portion size is constant. Furthermore, a possible conflict of interest is found, as EUFIC receives funding from the European food and drink industry, and Klaus G. Grunert received funding from EUFIC to carry out this study (EUFIC).

Criticism of the GDA labeling scheme:

Since the GDA scheme became a voluntary part of nutrition labeling, several critics have made their voices heard. In this segment I chose to shine light on the mainstream negative criticism, of the GDA label. As mentioned earlier, the British retail market and consumers has more experience with the GDA label than the Danish market. That is why I have chosen to investigate the critical voice of the Danish and the British stakeholders. To represent the mainstream negative Danish criticism, I have chosen a report made in collaboration between The Danish Consumer Council, Danish Cancer Society, Danish Dairy Board, the Federation of Retail Grocers in Denmark, the Danish Diabetes Association and the Danish Agricultural Council. The report is named "Guideline Daily Amount (GDA) No thank you!" from February 2009. I have chosen this report because of the wide range of underlying actors. To represent the mainstream British criticism I have chosen the National Heard Forum. The NHF is involved with advocacy and policy research to support the public sector, commercial operators and the government. The National Heard Forum has criticized the GDA labeling scheme in their report "misconception and misinformation: The problem with Guideline daily Amounts (GDAs)" from February 2007.

The critics accuse the GDA labeling scheme of not supporting healthy eating, based on portion sizes, the one adult figure for calories, sugar references and several other things.

This part of the report will analyze the claims made by the critics of GDA; assessing the validity of their claims and examining if these concerns have been addressed in the earlier mentioned report by

the European Food Safety Authority' Panel on Dietetic Products, Nutrition and Allergies. This will be followed by a short and critical review of the positive attributes of the GDA label.

Minimum, Average and Maximum:

The first critique point raised in the National Heart Forums report is the lack of distinction between upper and lower limits. The example used in their report has to do with saturated fat. NHF argues that a healthy diet has anything between 0% and 10% saturated fat. When the GDA reference level is given as grams based on 10% of the total energy intake, without clearly indicating this as the maximum level of consumption, it implies that the target is the full 10% NHF argues (National Heart Forum). Consumers currently eating less than the recommended amount might be wrongly encouraged to increase their intake. While the Panel on Dietetic Products, Nutrition and Allergies, called the Panel, recognizes that 10% is the upper or maximum level of saturated fat, the Panel argues that it is at the lower end of average saturated fat intakes in adults in European countries, which are at 9 – 18% (EFSA).

Whether a nutrition label should communicate clear and straight forward data, or should seek to regulate consumer behavior will be investigated in debt later in this thesis.

The one adult figure:

Both the report by NHF and the report by the different Danish institutions, mentioned above, highlight the one adult figure as being potentially misleading. The Danish report claims that the GDA is always based on a 2.000 calorie diet needed by a 40 year old moderately active woman. The report goes on to explain that the calories needed by children are significantly lower, and there for the one adult figure is misleading (GDA no thank you). NHF argues that GDA values for adults and children are not used consistently i.e. child targeted products can be equipped with either the one adult figure based on 2.000 calories or the GDA values for children, which are significantly lower. In this way, a manufacturer can choose to use a GDA reference of a 2.000 calorie diet on products directed at children, which in turn imply that the product supplies a smaller proportion of the daily referenced intake of for example sugar (National Heart Forum). Although both reports pick out the one adult figure as misleading, the two critique points are contradictory, as the one report points out that GDA based on a 2.000 calorie daily intake is uniformly used, and the other report states that both the adult figure and GDA based on a child's diet are used, though not consistent. An obvious source of error could be country diversity, since the one report is Danish and

the other report is British. To investigate the claims made in the two reports, I have taken a small sample of child targeted products.

The case for children:

I have picked out the five products, with a special eye for marketing directed at children. I have found every one of these five products aimed at child consumption. This is in turn backed up by each product's homepage. For information on point of purchase and further details on the different products and their homepages, see annex 2.

In the sample results seen below, three questions are included; whether I have found the product to be directed at children, who GDA is calculated for and if CIAA's recommendations are followed. By CIAA's recommendation is meant the advice; that if companies choose to provide only one GDA value, a sentence should be added, indicating that active men have higher requirements and young children lower, as earlier mentioned.

Product	Kellogg's Coco Pops	Kinder Milk-Slice	Kinder Surprise	Kinder Pingui	Smarties
Targeted at children	Yes	Yes	Yes	Yes	Yes
GDA calculated for	Adult (2.000 kcal diet)	Adult (2.000 kcal diet)	Adult (2.000 kcal diet)	Adult (2.000 kcal diet)	Children (1800 kcal)
CIAA recommendation followed	Yes	Yes	Yes	Yes	Yes

The result of the sampling shows that the 2000 kcal diet is not uniformly used, see the picture below.

The result of this small sample validates the critique of changing reference persons, put forth by the NHF.

Public Health Policy and Individual Health:

The NHF are concerned that the values chosen for the GDAs may not be adequate for improving public health. Furthermore the NHF claims that the GDA values do not correlate with authoritative reviews from both Eurodiet and the WHO, specifically on saturated fatty acids (National Heart Forum). To investigate if the criticism is appropriate I have constructed the following model.

Component	GDA[2]	WHO[3]	Eurodiet[4]	GDA adjusted by EFSA[5]
Total fat	31,5%	<30-35%	<30%	31,5%
Saturated fat	9%	<10%	<10%	9%
Carbohydrates	46%	>55%	>55%	52%
Sugar	18%	-	-	18%
Added sugar	(9%)	10%	=<4 times per day	9%
Salt	6g	5g	6g	6g

[2] (EFSA)
[3] (FAO/WHO fatty acids)
[4] (Eurodiet)
[5] (EFSA)

As seen in the constructed table above, the amount of total fat is well within the recommendations of WHO and slightly above, 1.5 percentage points, the recommendations from Eurodiet. It should be said that Eurodiet mentions, that some would argue that the population target should be as low as 20% to 25% (Eurodiet).

The level of saturated fat is 1 percentage point lower that the maximum recommended amount by both WHO and Eurodiet. In NHF's criticism of the levels of saturated fat recommended, they refer to an older WHO report (WHO Geneva). While the older report from 2003 states that total fat recommendations should be between 15% and 30%, it still recommends the amount of saturated fatty acids at <10%. It has not been possible to find evidence for NHF' critique of the saturated fat levels, from the sources they mention in their report.

I have found a miscorrelation between the levels of carbohydrates proposed by the different organizations. The GDA adjusted by the EFSA is 6 percent points higher than the original proposed values from the commission. EFSA recognizes that the lower limits of total carbohydrates intake recommended for the population of EU is generally 50-55% of the daily intake. The recommendations are used to ensure limited intake of total fat and saturated fat (EFSA). Even though EFSA raises the recommendations with 6 percent points, it still falls 3 percent points short of the minimum recommendations by WHO and Eurodiet.

The recommended total sugar intake by the EFSA is 18%. Eurodiet and WHO has no recommended intake for total sugar. For added sugar, on the other hand, the EFSA is 1 percent point lower than the recommendations by WHO.

The GDA for salt aligns with the recommendations from Eurodiet and is 1g higher that the recommendations from WHO.

<u>The portion trick:</u>

The next point of critique, the Danish and the British report both have in common. Both reports raise the concern that using a portion instead of per-100 grams or per-100 mL as reference point can be misleading. The proposed legislation; The Provision of Food Information to Consumers, formally adopted in autumn 2011 (Adoption Calendar COM 2008), gives the official guidelines for expression of GDA on a per portion basis (COM 2008). The Regulation states, that nutrition information may be expressed per portion in addition to per 100g or per 100mL, provided that the

number of total portions in the package is stated (COM 2008). Furthermore the regulation states that the nutrition declaration can be expressed on a portion basis alone, if the food is pre-packed in an individual package (COM 2008). The two main critique points regarding per portion labeling are relative small portion sizes and the inconsistency in portion size across different brands.

The Danish report "GDA no thank you", claims that portion sizes are set unrealistically low. The lower the portion the healthier the product looks. They back up their claim with the notion that no portion fits all (GDA no thank you).

The report by NHF addresses the problem from a different angle. The NHF points out that portion sizes change. When portion sizes on substituting products differ, it makes it very difficult for consumers to make reliable comparisons. To illustrate and validate the claim that portion sizes change, I have taken a small sample of cheese flavored chips.

As the pictures clearly show, the two products have different portion sizes. The product on the left, Osterejer uses 30g as its portion size, while the product on the right, Doritos, uses 25g as their portion size. If a consumer wishes to compare the two products in terms of kcal, the following calculation is necessary.

Osterejer contains 155 kcal for every 30g

Doritos contains 128 kcal for every 25g

Relating Doritos to Osterejer:

$128 * 4 = 512$ The amount of kcal per-100g for Doritos

$512 * 0{,}3 = 153.6$ The amount of Kcal per-30g serving of Doritos

This example adds to the validity of the critique on portion sizes.

<u>Lack of consistency in choice of nutrients:</u>

The NHF finds it potentially misleading that some GDA signals sometimes are included or left out. Specifically NHF points out that the IGD has not agreed on a GDA for iron or calcium. To investigate if there is any truth to the matter, I have examined the underlying rules and guidelines found in EU law.

In 1990 the directive 90/496/EEC was adopted by the European commission. The basis for the directive and the later corrections and successive amendments, has been to adopt measures to support the gradual completion of the internal European market, gain public knowledge of nutrition and create appropriate nutrition labeling, to make it easier for the consumer to make informed

choices (Direktiv 90/496/EØF). The directive specifies the recommended daily allowances of vitamins and minerals and defines a rule of what constitutes a significant amount. The directive gives a uniform approach to food labeling in the European Union. The directive makes it clear that nutrition labeling shall be optional unless, a nutrition claim appears on labeling, in presentation or in advertising, in these cases nutrition labeling is compulsory (Corrections to Directive 90/496/EEC). The mandatory information that must be provided is divided into two groups.

Group 1:

Energy value

Protein

Carbohydrates

Fat

Group 2:

Energy value

Protein

Carbohydrates, of which sugar

Fat

Saturated fatty acids

Fibre

Sodium

Where nutrition claims regarding sugar, saturated fatty acids, fibre or sodium are made, information on group 2 must be provided (Direktiv 90/496/EØF).

Although the claims made by NHF about the lack of GDA for iron and calcium may have been justified when their critique was published in February 2007, it has since become obsolete. The successive amendments added in the Provision of Food Information to Consumers mentioned

earlier, include a list of vitamins and minerals which may be declared along with their recommended daily allowances.

The Sugar Reference Trick:

The last of the critique point surrounding GDA's misleading attributes is called the sugar reference trick. The assembly of Danish organizations behind the "GDA no thank you" report finds it misleading, that GDA does not distinguish between indigenous and added sugar. They claim that the food industry, and thereby the GDA labeling scheme, disregards the difference between added and natural sugar (GDA no thank you). This does not seem to be an exact truth. As presented earlier the EFSA argue that the recommended daily intake of 400g fruit and vegetables and three portions of dairy products amount to 45g of indigenous sugars, which is half of the referenced intake for total sugars. The EFSA is assuming that the latter half of the recommended intake is added sugar, which corresponds to 9 % of the energy in a 2.000 kcal diet (EFSA). An added sugar level at 9% is one percentage point lower than what is recommended by WHO.

Even though the criticism of the sugar reference thereby is flawed, it does have some valid points. The lack of a figure for added sugar can make it increasingly difficult for consumers to distinguish between healthy and unhealthy products. Since one of the objectives of regulation on the nutrition labeling area, is to enable consumers to make informed, safe, healthy and sustainable choices and seeks to avoid misleading labeling (COM 2008), nutrition labeling must be able to differentiate between healthier and unhealthier foods. By not referencing added sugar, it does become increasingly difficult for the consumer to watch his or her intake of added sugar.

Also, the EFSA's calculations are heavily dependent on the recommendations of a daily intake of 400g fruit and vegetables, if these are not followed; I can see no obvious reason to think that the implicit recommendation of 9% added sugar will be met by the consumers. However, a study conducted by the European Prospective Investigation into Cancer and Nutrition (EPIC), has shown that the recommended daily intake of 400g fruit and vegetables is not followed. In fact, country specific medians ranging from 231 g/d to 511 g/d, clearly show a non-uniform intake of fruit and vegetables across Europe. This inhibits the EFSA's argument and strengthens the validity of the critique.

The positive attributes of the GDA label:

The critique of the GDA label has not only been negative. Also positive attributes has been assigned to the label. One of the advantages of the GDA label is its ability to present a realistic view on a product's impact on the daily diet of the consumer (Heddie Mejborn DTU). This requires that the portion size is realistic, and that the consumer has the same dietary needs as the reference person used on the label. This is not possible with a nutrition label using a calculation method based on per-100g.

The CIAA - The Confederation of the Food and Drink Industries of the EU, who developed the GDA label, find it to be a most useful label. The CIAA argues that the GDA label helps consumers to evaluate any combination of food's contribution to their daily diet. They further argue that color coded labeling schemes, does not have this ability, and that if anyone contains themselves to eating only green color coded food, they would lack several nutrients and vitamins (CIAA's scheme). As for the portion sizes, CIAA finds them more useful than a per-100g listing. In opposition to earlier mentioned critical voices, the CIAA finds the standard per-100g listing to be more misleading than the portion based GDA label. They claim this is so, because no one always eats portions equivalent to 100g. To emphasize the positive attributes of the GDA label, the CIAA uses four main adjectives; factual, objective, clear and user-friendly and informative (Why GDA).

There is no denying that the information on the GDA label is factual. Based on an adult woman's daily needs expressed per portion of the product, the GDA conveys factual values of contained nutrients. The label is also objective, passing no judgment on whether a product is healthy or unhealthy. Instead the subjective assessment of a product's healthiness is left to the consumer. Whether the GDA label is clear and user-friendly is not as easily answered. First off, the detailed information provided by the GDA label, makes it more complex than simpler labels. Secondly, the method of calculation requires the consumer to deal with portion size, age and gender, to effectively take advantage of the detailed information provided. If the consumer is a moderately active adult woman, the GDA label would seem clear and user-friendly. The GDA label is informative since it conveys information to the consumer. How informative the GDA label is, meanwhile depends on the benchmark. If the consumer can identify with the reference person used on the GDA label, the label then provides more personalized information to the consumer. If the consumer has different needs than the reference person, then the information loses significant relevance.

Analysis

The case of Kellogg's Coco Pops.

In addition to the critique points reported in the earlier segment, the Danish Consumer Council has reported Kellogg's Coco Pops to the Danish Veterinary and Food Administration, under the Danish Ministry of Food, Agriculture and Fisheries (Consumer Council Complaint 2008) for misleading labeling related to the Guideline Daily Amount. The notification was sent April 24 2008 and consists of three allegations; misleading sugar references, misleading portions sizes and the use of an adult woman's GDA. This segment will identify the points of complaint in greater detail, the subsequent judicial decision, complaints hereof and through an analysis of the products semiotic cocktail; investigate the grounds for Kellogg's Coco Pops' misleading use of the GDA labeling scheme.

<u>The points of criticism in the complaint:</u>

The Danish Consumer Council states that the food industry has set the recommendations for total sugar intake at 90g per day. Furthermore they argue that although The Nordic Nutrition recommendations do not give recommendations on total amount of sugar intake, they do give recommendations on the intake of added sugar. This is 55g for men and women and 30-65 for children. They go on to argue that products with a high level of added sugar therefore should have a much higher GDA value for sugar, if it is to align with the recommendations (Consumer Council Complaint 2008).

The second point of criticism from The Danish Consumer Council is aimed at the portion sizes. They state that the portion size of 30g Kellogg's Coco Pops is too small, and that it is impossible to set a standard portion size for cereals. In their complaint they reference three different studies, two Danish and one British which shows portion size of 46g, 72g and 70g respectively. The only one of these reports actually testing consumption of Kellogg's Coco Pops being the British study (Consumer Council Complaint 2008).

The last point of complaint in the notification relates to the use of an adult woman's GDA as a reference point. This is found misleading as the product is found to be directly targeted at children in its composition, labeling and marketing by the Danish Consumer Council (Consumer Council Complaint 2008).

Reactions from the Danish Veterinary and Food Administration:

The Danish Veterinary and Food Administration have followed up the complaint with a Notice of injunction to Nordisk Kellogg's A/S September 10 2008 (Notice of injunction 2008). In it, they demand that the chosen reference person for the GDA label is clearly presented and that the consumer is sufficiently informed about the constructed reference value for sugar. Furthermore the Danish Veterinary and Food Administration deliver a detailed answer to each of the critique points in the notification from the Danish Consumer Council (Notice of injunction 2008).

Regarding the complaint of the portion size of Kellogg's Coco Pops, the Danish Veterinary and Food Administration have found it necessary to make a specific assessment, of which type of product Kellogg's Coco Pops is. They have decided that there is no need to divide cereals into sweetened and regular cereals, because both are used in the same manner and consumers are considered to perceive the products to be similar. With this in mind the Administration references information from the Danish Technical University; this states that a realistic portion size for cereal in general is 35g. On these grounds and the consideration that portion sizes does not have to fully correspond to 35g, the Danish Veterinary and Food Administration finds Kellogg's Coco Pops' use of portion size not misleading (Notice of injunction 2008).

Regarding the criticism of the adult figure for GDA on a product specifically targeted at children, the Danish Veterinary and Food Administration mentions that it is significant, that the label clearly states that the referenced values are calculated on behalf of an adult woman. The Danish Veterinary and Food Administration do not however touch on the core of this criticism, as the disproportion between a woman and a child's GDA is not mentioned.

Regarding the criticism of the sugar reference, the Danish Veterinary and Food Administration has imposed a specific requirement on Kellogg's Coco Pops. It must be disclosed on the packaging that the sugar content of the product mainly consists of added sugar, and that the recommended intake of added sugar for an adult woman is 50g per day.

The answers form the Danish Veterinary and Food Administration did not satisfy the Danish Consumer Council, and soon after receiving the answers a complaint was filed.

Criticism of the decisions

The Danish Consumer Council filed a complaint with the Food and Veterinary Complaints Board on October 8 2008. The complaint is based on the council's notion that the judgment does not reflect the statements of the Danish Minister of food, Agriculture and Fisheries or the Danish Veterinary and Food Administration's own instructions on monitoring GDA labeled food (Consumer Council Complaint 2008). In the complaint the Danish Consumer Council outlines the former points of criticism and relates them to the answers given by the Danish Veterinary and Food Administration. The Danish Consumer Council is pleased with the decision on the enhanced disclosure of the sugar reference, but stresses that the packaging should also include information that the GDA value for sugar, does not represent the maximum allowed intake of added sugar (Consumer Council Complaint 2008).

The Danish Consumer Council completely disagrees with the ruling that a 30g portion size is not misleading. Referencing the same studies as in their original notification of April 24 2008, the Danish Consumer Council feels certain that the portion size of sweetened cereal, including Kellogg's Coco Pops, can be estimated to 45g. Furthermore the Danish Consumer Council emphasizes that the difference between 30g and 45g is 50%. Lastly the complaint visualizes the problem with the target ordains by quoting the Danish Veterinary and Food Administration:

"Nogle produkter markedsføres målrettet over for børn. Det kan derfor betragtes som vildledende, at produkter, der markedsføres med børn som målgruppe, benytter referenceværdier, som gælder for voksne." (Consumer Council Complaint 2008)

Translation: Some products are targeted at children. It can therefore be considered misleading, that products, targeted at children, uses reference values calculated for adults.
The Danish Consumer Council goes on to say that, both Nordisk Kellogg's A/S and the Danish Veterinary and Food Administration agrees, that Kellogg's Coco Pops primarily are consumed by 4-14 year old children. The Danish Consumer Council then asks the Food and Veterinary Complaints Board to relate to the principle of the matter; that GDA values for adults are used on products targeted at children (Consumer Council Complaint 2008).

Answers from the Food and Veterinary Complaints Board:

The Food and Veterinary Complaints Board answers the complaint filed by the Danish Consumer Council on March 26 2010. Rulings by the Food and Veterinary Complaints Board cannot be appealed (Veterinary Complaints Board HP). In the ruling, the Food and Veterinary Complaints Board emphasize that the GDA is not a nutrition label, but a nutrition claim. This means that the GDA labeling scheme must comply with the general prohibition on misleading marketing. The Food and Veterinary Complaints Board goes on to explain that the essential part of the law is that, the marketing of a food product should not give the average consumer false expectations (Veterinary Complaints Board 2010).

Even though the contents of sugar in Kellogg's Coco Pops mainly stems from added sugar, the Food and Veterinary Complaints Board finds the reference value of total sugar not misleading. In their decision, the Food and Veterinary Complaints Board focuses on the fact that no uniform European guide for total sugar intake exists, and that the European Food Safety Authority states that the GDA's use of total sugar reference is not in violation of national dietary recommendations (Veterinary Complaints Board 2010).

The Food and Veterinary Complaints Board finds it not misleading, that the GDA label on Kellogg's Coco Pops is based on an adult woman, although clearly marketed and consumed primarily by children. This decision is based on the Board's view that if the GDA labeling scheme is to be transparent, understandable and simple, the one adult figure is necessary (Veterinary Complaints Board 2010).

The last point of critique from the Danish Consumer Council is also swept off the table. The Food and Veterinary Complaints Board finds the portion size of 30g not misleading. The Board points out that the size of the portion should be seen in relation to the GDA label based on an adult woman. To this the Board adds, that they cannot consider the question of uniform portion sizes in general, but only in relation to the specific case of Kellogg's Coco Pops (Veterinary Complaints Board 2010).

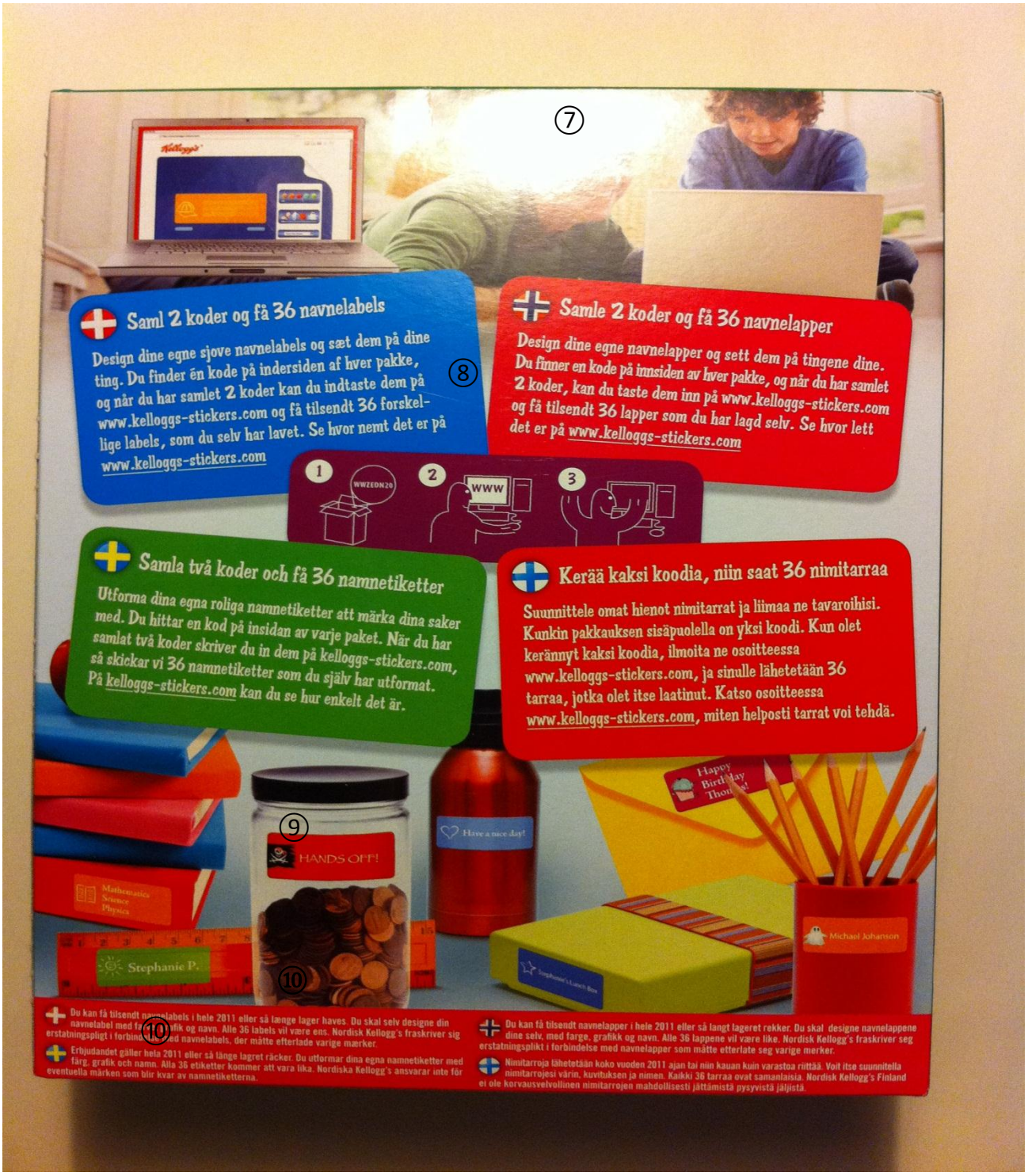
The Semiotic Cocktail of Kellogg's Coco Pops:

The purpose of this segment is to analyze the semiotic composition of Kellogg's Coco Pops to investigate, to what extend Nordisk Kellogg's A/S complies with the Notice of injunction of

September 10 2008 (Notice of injunction 2008) and to investigate additional misleading properties of Kellogg's usage of the GDA label. Furthermore it is within the scope of this segment to present a constructive critique of the course of proceedings and advise on how to improve the products transparency relating to the GDA label.

Kellogg's Coco Pops – Front of box

Kellogg's Coco Pops – Back of box



Kellogg’s Coco Pops – Side of box - Zoom

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SE: Om Du vill komma i kontakt med Kellogg's Konsumentkontakt kan Du skriva till oss på adressen: Nordisk Kellogg's Sverige, Konsumentkontakt, Box 742, 194 27 Upplands Väsby. Har Du kommentarer till denna produkt, ber vi Dig vänligen returnera den i originalemballaget med upplysningar om inköpsställe.

***Guideline Daily Amounts (GDA)**
= Viitteellinen päiväsaanti
= Vägledande dagligt intag

Kcal 114 6%

Energiamäärä (kcal) 30 g:n annoksessa
Energimängd, (kcal) i en 30 g portion

Tämä prosenttiluku kertoo 30 g:n annoksen energiamäärän viitteellisestä päiväsaannista
Procentandel som 30 g ger av vägledande dagligt kaloriintag

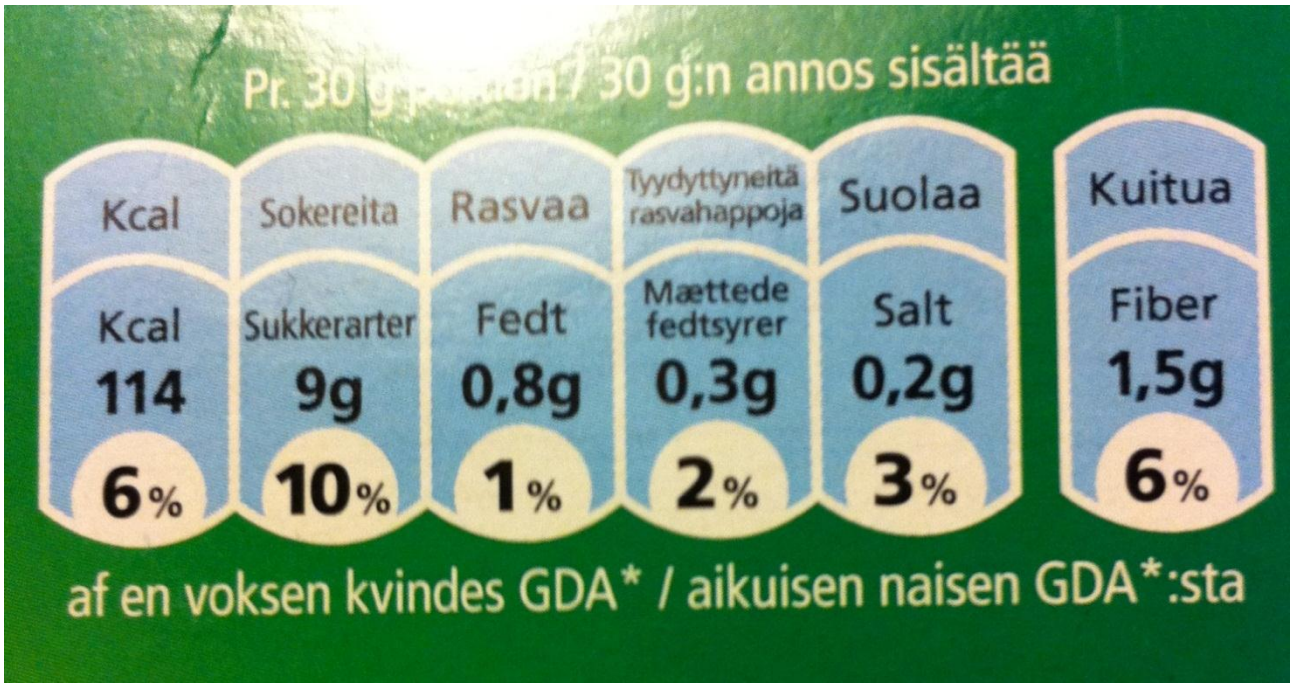
Aikuisen naisen viitteellinen päiväsaanti
Referensvärden för en vuxen kvinna

Kcal	2000
Sokereita / Sockerarter	90 g
Rasvaa / Fett	70 g
Tyydyttyneitä rasvahappoja / Mättat fett	20 g
Suolaa / Salt	6 g
Ravintokuitua / Fiber	25 g

Yllä oleva taulukko on viitteellinen, ei tavoite. Aikuisen naisen viitteellinen päiväsaanti perustuu eurooppalaiseen ravintoaineiden merkintäsuositukseen. Yksilöllinen tarve riippuu luonnollisesti iästä, sukupuolesta ja fyysisestä aktiivisuudesta. "Sokerit" sisältää sekä luontaisia sokereita (hedelmistä, marjoista ja maidosta) että lisättyjä sokereita. Tämä tuote sisältää pääasiallisesti lisättyä sokeria. Aikuiselle naiselle suositellaan korkeintaan 50 g lisättyä sokeria päivässä. Lisätietoja www.kelloggs.fi

Ovanstående tabell är vägledande, inte ett mål. Referensvärdena är baserade på europeiska kostrekommendationer för en vuxen kvinna. Det individuella behovet beror naturligtvis på ålder, kön och aktivitetsnivå. "Sockerarter" inkluderar både naturligt socker (t ex från frukt, bär och mjölk), samt tillsatt socker. Denna produkt innehåller huvudsakligt tillsatt socker. En kvinna rekommenderas att högst inta 50 g tillsatt socker per dag. Mer information får du på kelloggs.se

Kellogg’s Coco Pops – Front of box - Zoom



The semiotic cocktail of Kellogg's Coco pops:			
Front 1	Masterbrand		
2	Subbrand		
	Mandatory information	*Voluntary information*	*Claims*
3	Quantitative description		
4		Animation	
5		Contest decription	
6		GDA nutrition label	GDA nutrition label
Back 7		Picture illustration	
8		Contest decription	
9		Picture illustration	
10		Contest decription	
Side 11	Product description		
12	Ingredients		
13	Nutrition decleration		
14	Producer		
15	GDA Guidance		
16	Controlled brand		

It is clear from the semiotic cocktail of Kellogg's Coco Pops, that the product is targeted at children. The overwhelming majority of the voluntary information on the package consists of, child friendly animations and contests directed at children.

The Notice of injunction of September 10 2008, from the Danish Veterinary and Food Administration (Notice of injunction 2008) states, that the label should clearly state that the referenced values are calculated on behalf of an adult woman, and that it must be disclosed on the packaging that the sugar content of the product, mainly consists of added sugar, and that the recommended intake of added sugar for an adult woman is 50g per day. The picture "Kellogg's Coco Pops – Front of box – Zoom" clearly shows that Nordisk Kelloggs complies with the first part of the injunction. The picture shows the front of box GDA label with a clear text telling the consumer, that the values are based on an adult woman. The second part of the injunction is being complied with on the side of the box. On the picture "Kellogg's Coco Pops – Side of box – Zoom", Kellogg's clearly states that the sugar content of the product mainly consists of added sugar, and that the recommended intake of added sugar for an adult woman is 50g per day. Furthermore the side-panel of the box describes that the guideline daily amount differentiates on age, gender and activity level.

Constructive Critique:

One of the points of critique raised by the Danish Consumer Council revolves around the portion size of Kellogg's Coco Pops. In their decision of September 10 2008, the Danish Veterinary and Food Administration find it essential that the proclaimed portion size is realistic (Notice of injunction 2008), but fails to explain in relation to whom. As pointed out earlier, the Unfair Commercial Practices Directive takes the average consumer as a benchmark, and in addition the benchmark is also aimed at particularly vulnerable groups of consumers, as I in this case identify as children in the age group 4-14 years. I do this because the Danish Consumer Council, the Danish Veterinary and Food Administration as well as Nordisk Kelloggs A/S themselves, recognize this age group as the primary consumers and target audience of the product (Consumer Council Complaint 2008). If a commercial practice is aimed at a specific target audience, it is desirable that the effect of said commercial business activities be assessed from the perspective of the average member of the specific target audience (DIRECTIVE 2005/29/EC).

In their search for scientific support of a specific portion size for Kellogg's Coco Pops, the Danish Veterinary and Food Administration reference two different studies. Both studies are carried out by DTU Food – National Food Institute. On August 15 and 21 2008 the Danish Veterinary and Food Administration was briefed by the National Food Institute on both of the studies (Notice of injunction 2008).

The first study was conducted in 1999 by registering people's portion sizes by weight. The cereal was divided into two categories; sugared cereal and regular cereal. The reasoning behind the differentiation, put forth by the National Food Institute, is that there is a nutritional difference and a difference in density, between the two product categories. Furthermore the National Food Institute informs the Danish Veterinary and Food Administration that consumers in general, consider sugared cereal child food and that sugared cereal mostly are consumed by children. The study shows that the average portion size for children in the age group 4-14 years are 30g for regular cereal and 45g for sugared cereal (Notice of injunction 2008).

The second study is from May 2008, it called the wholegrain study. It was conducted by letting respondents point to a portion representing the portion size they normally eat. The result of 35g reflects the portion chosen by the respondents as a function of the market share of the specific product. In this study both sugared and regular cereal was represented as one category. The National Food Institute points out to the Danish Veterinary and Food Administration that, the method used in the wholegrain study is less precise than the earlier study from 1999 (Notice of injunction 2008).

Lastly the National Food Institute concludes that a portion size of 45g sugared cereal is realistic for the age group 4-14 years (Notice of injunction 2008).

To determine the case, the Danish Veterinary and Food Administration find it essential to assess the product category. By determining the product category as cereal, instead of sugared and regular cereal, regardless of the consumption information given by the National Food Institute, the Administration, in my opinion, makes a critical error. In determining a realistic portion size, the Danish Veterinary and Food Administration states that, what the typical consumer of the product is likely to consume is of crucial importance (Notice of injunction 2008). The typical users of Kellogg's Coco Pops are children in the age group 4-14 years, but that is not what the decision reflects. Instead it reflects the portion size of light cereal consumed by the average Danish citizen (Fuldkorn 2008). By choosing not to divide cereal into sugared and regular cereal, the Danish Veterinary and Food Administration forces themselves to draw conclusions, based on the less specific study. In this way the Danish Veterinary and Food Administration conclude that Kellogg's use of a portion size of 30g is not misleading, although the typical users of the product has an average consumption that is 50% higher. Had the Danish Veterinary and Food Administration differentiated between sugared and regular cereal, I find it likely that the portion size would be set

at 45g, and would be backed by more precise science and the Unfair Commercial Practices Directive.

Nordisk Kelloggs complies, as mentioned, with the requirements in the notice of injunction of September 10 2008. Nevertheless, I find that a simple reallocation of information on the package would increase the transparency of the product. Moving the sugar information to the proximity of the GDA Label, as seen below, would in my opinion give the consumer a better chance to relate the mandatory sugar information to the GDA label.

When viewed like this, it becomes more apparent that the Sugar and GDA information are linked. Both the Danish Consumer Council (Consumer council complaint 2008) and the Veterinary and Food Administration (Notice of injunction 2008) agree that the size of the Kellogg's Coco Pops' package is sufficient, to require the information to be printed on it. This suggestion should be seen in the light of the very limited time consumers' use for information search when buying groceries (Teknologisk Institut).

Focus group interview:

The purpose of the focus group interview is to gain insight into consumer attitude towards nutrition labeling, with a particular focus on the GDA label. Portion size, the question of reference person

and the immediate understanding of the label will be sought discussed in the course if the interview. This segment presents the answers to seven different questions discussed by the focus group. The questions presented in this segment does not correlate exactly to the questions as asked in the focus group, but rather presents overarching questions answered by the focus group. For the full transcription and exact wording of questions and answers and information on respondents see Annex 1.

The reason for using a retrospective focus group interview:

Pertaining to the segment on Kellogg's Coco Pops:

Extensive quantitative research on standard portions has already been undertaken by the National Food Institute. A qualitative discussion on the use of portion size could yield new pitfalls and advantages on the portion size issue. Conducting a qualitative study rather than a quantitative study, allows the moderator to present physical objects to the respondents, and judge their reactions in real time. This will be done in relation to the first question, by presenting the focus group with three different portion sizes of a product, and subsequently initiate a discussion of realistic portion sizes.

Pertaining to the mainstream critique of the GDA label:

A discussion, rather than quantitative results, makes it possible to identify systematic errors in the design of the label, which could lead to consumers being misled. Suggestions to improve the transparency of the GDA label falls within the scope of this focus group interview, in conjunction with the picture showed below.

Pertaining to the adult reference person:

A quantitative survey is ideal to study the level of label-comprehension in a large population, but to investigate the perceived importance of the calculation method, used on the label, a qualitative study is the best solution. The usability of different calculation methods will be discussed in the focus group interview.

Selection of respondents:

To participate in the focus group respondents need to comply with certain requirements. The first requirement is that every respondent must be of adult age. If the focus group is composed of both adults and children, the risk of falls agreement among respondents would be greater. Secondly the

respondents must be the one who undertakes most of the grocery shopping in their respective households. This requirement is important to assure that the respondents regularly are exposed to nutrition labeling. The last requirement pertains to literacy. Every respondent must have a level of literacy, which provides them with the ability to read and understand the wording on standard nutrition labeling. This is assured through level of education. Each respondent has passed collage level exams in both English and Danish. Furthermore each respondent has answered no, when asked if they suffer from dyslexia. No spelling or reading test has been issued to the respondents. In the composition of the focus group it has been ensured, that both the male and female gender is represented.

Interview results:

Three portions of the sugared cereal, Kellogg's Coco Pops, are presented to the focus group. The portions are of 30g, 45g and 70g. The 30g portion is the one recommended by Kelloggs. The 45g portion is found, by DTU – the National Food Institute, to be the average portion size for the average consumer, children in the age group 4-14 years. The third portion represents the portion size referred to by the Danish Consumer Council, as the average portion size of Kellogg's Coco Pops in a British study conducted by the Food Standard Agency (consumer council complaint). The exact weight of each portion will not be disclosed to the respondents beforehand.

After the three portions are presented, the discussion opens with the following question:

Which of these portion sizes corresponds to your average intake of sugared cereal?

Out of the five participants in the focus group, two would choose the 45g portion size, one chose the 70g portion size, and two participants stated that all of the three portion sizes were too small. The two participants who chose the 45g portion were both female. This illustrates that portion size preferences change and that no one portion size fits all. After a short discussion on the three portion sizes presented, the moderator pulled the discussion in another direction, only to return to the topic in the last part of the interview. There, the participants were asked whether the portion size used by Kelloggs was guiding or misleading to them in particular. When confronted with the three portion sizes again, one of the participants mentioned that the smallest portion looked like it would fit the needs of a child, and all of the participants agreed that the portion size used, would be misleading to them.

Which authority should determine portion sizes on nutrition labeling?

When asked who was determining the portion sizes, more than one participant assumed that the portion sizes were set by a legal authority. As the discussion progressed consensus was found among the participants, that the portion size must be determined by either the EU or by some food science authority in each country. This was found by all the participants to be absolutely crucial pertaining to the usefulness of the GDA label. It was mentioned that if the companies themselves estimated the portion sizes, the GDA label would lose all of its credibility. In the discussion, significant weight was put on, that it was natural to assume, that the portion size was set by authority.

The focus group is presented with a print of a random GDA label.

Have you seen this label before?

At first, when confronted with the GDA label, all of the participants stated that they had seen the label before. When asked immediately after, if any of the participants never had seen the label before, some confusion arose. Some of the participants maintained that they had seen the label before, while others corrected their statement by saying, that they thought that they had seen it before, and went on to state that the label had to do with a product being healthy or not.

Do you use Front-of-Pack labels when shopping for groceries?

As for whether the participants actually used Front-of-Pack type nutrition declarations, the participants were divided in three. One always used the back-of-pack nutrition label in addition to any label on the front, while one never used any of them and three participants used them occasionally. More than one of the participants, who admitted to use front-of-pack labels, mentioned that they related front of pack labels to promotional material. This in turn was found to lower the labels credibility.

How do you understand this label?

When asked to decipher the label great confusion arose. The first point of confusion related to the design of the GDA label. The figures pertaining to the amount of each nutrients measured in gram was decoded first. This seemed to be easily understandable information. But the figures relating to the percent of a moderately active woman's guideline daily amount was not so easily decoded. First off, the participants related the percent numbers to how much was in the product of any given nutrient, even though the text below the label clearly read "of an adult's guideline daily amount". When this failed to make sense, the participants, through a short discussion, arrived at the conclusion that the numbers related to the nutritional goal of an adult male. All of the participants expressed that they would not use the percent figures themselves. When asked into the reason why they were reluctant to use the percent figures, the participants expressed numerous concerns. One point raised was that one's optimal nutritional intake would change greatly with the level of exercise, age, gender and habits. Another argument was that the percent figures was confusing and that a person who had different nutritional requirements, than the one expressed by the label, would have to make to complicated calculations if one was to relate the numbers to one self.

Do these values represent the maximum or the optimal intake of each nutrient?

When asked further into the percent figures, of the GDA label presented, even more confusion became apparent. No consensus was found on whether the figures related to the maximum, minimum or optimal nutrition intake. Every one of the three possibilities was expressed as likely by the participants.

What is the most important message for a Front-of –Package nutrition claim, like the GDA label, to disclose to the consumer? And how could the design of the GDA label be changed, to meet your requirements for nutrition labeling?

It was mentioned that any nutrition label should convey accurate values of what the product in fact contains. It should be clear to everyone what the label represents. A traffic light was used as a metaphor by one of the participants, as a concrete way of conveying information. In general, consensus was found among the participants, that the upper part of the GDA label presented was very useful. It should be said that the GDA label presented to the participants had a portion size of 100g, which was found to be to everyone's liking. It was proposed by several of the participants that uniform portion sizes are very important. It was mentioned that an important part of a nutrition label is its ability to form a basis for comparison between products, even between products of different product-categories.

There was consensus among the participants that removal of the percent figures would make the label more useful. The percent figures gave rise to confusion rather than conveying useful information.

Do you prefer that a nutrition claim is based on per-100g or on a portion size?

All but one of the participants found that the per-100g reference was clearly preferable. The last of the participants argued that she didn't care, and that people might as well look at the back a product for that kind of information.

Potential for misleading:

Not only did the majority of the participants in the focus group interview prefer nutrients listed per 100g, but more than one participant assumed that the portion sizes were set by a legal authority. Furthermore it was mentioned that if the companies themselves estimated the portion sizes, the

GDA label would lose all of its credibility. Credibility is essential when trying to convey a message. This potential for misleading the consumer should not be taken lightly. When consumers relate nutrition labeling to consumer protection, it is imperative that some authority exercise this protection. Instead of leaving it to the industry to come up with portion sizes, some rigorous legislative guideline should be issued by the state, the EU or another authoritative agency.

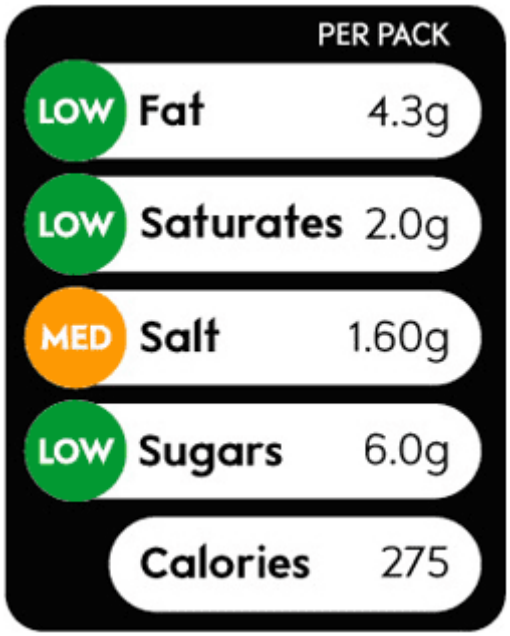
The focus group interview elaborated on the importance of informing the consumer about the basis of calculation. Through a short discussion, the focus group arrived at the conclusion that the numbers related to the nutritional goal of an adult male. This is wrong. In line with the earlier mentioned critique by the NHF, no consensus was found on whether the figures related to the maximum, minimum or optimal nutrition intake. This significantly lowers the usefulness of the GDA label and validates the critique by the NHF.

The percent figures on the GDA label was found misleading by the focus group. This potential for misleading the consumer is woven into the structure of the GDA label. Consensus was actually found among the participants, for a removal of the percent figures from the label, as the percent figures gave rise to confusion rather than conveying useful information. The figures were found useless at best, since one's optimal nutritional intake would change greatly with the level of exercise, age, gender and habits.
In line with the earlier mentioned critique presented in the report GDA – No thank you, on unrealistically small portion sizes, all of the participants agreed that the portion size used on Kellogg's Coco Pops, would be misleading to them.
In line with the study; The Impact of Health Claims on Consumer Search and Product Evaluation Outcomes: Results from FDA Experimental Data (ROE 1999) examined in the literature review, Halo effects were observed in the focus group interview. Without mentioning the halo effect per se, one of the participants mentioned that he would attach additional value, or a plus effect, to the product because of the placement of the label on the front of the package. If the GDA label induces a halo effect because of its presence, then the label is capable of misleading the consumer.

A comparative analysis of the monochrome GDA label and the Traffic light system:

There are many alternatives to the GDA labeling scheme. One of the more popular ones is called the traffic light label. This segment will present a short presentation of the traffic light label

followed by a comparative analysis of the GDA and the traffic light labeling schemes. The shared frame of reference between the GDA and the traffic light label, in this point-by-point comparative analysis, will be the potential for misleading the consumer in each of the categories investigated. The grounds for comparison, is that the traffic light label uses a different set if instruments to communicate the healthiness of any given product. The traffic light label does not use a reference person, but uses per-100g and per serving instead. Also, the traffic light label uses color coding; red, amber, green to signal the amount of each nutrient. This type of traffic light label is unlike the earlier shown traffic light label, a hybrid label. The two labeling schemes are different in information, looks and composition, but in the end, both labels should be able to differentiate between healthy and unhealthy food.



Source: (Advanced traffic)

The hybrid traffic light label consist of nutrient information calculated per serving, accompanied by a rating; high, medium, low, of each nutrient. The rating is color coded red, amber, green signaling high, medium, low, respectively for quick recognition. The colors are assigned to each nutrient according to the table below.

Table 1 – Food (per 100g whether or not they are sold by volume)

	Green (Low)	Amber (Medium)	Red (High)	
Fat	≤ 3.0 g/100g	> 3.0 to ≤ 20.0 g/100g	> 20.0 g/100g	> 21.0g / portion
Saturates	≤ 1.5 g/100g	> 1.5 to ≤ 5.0 g/100g	> 5.0 g/100g	> 6.0g / portion
Sugars[10]	≤ 5.0 g/100g	> 5.0 to ≤ 12.5g/100g	> 12.5g/100g	> 15.0g / portion
Salt[11]	≤ 0.30 g/100g	> 0.30 to ≤ 1.50g/100g	> 1.50 g/100g	> 2.40g / portion[12]

Source: (Food 2007)

Both the total amount of sugar and the amount of added sugar determines the color coding. To achieve the green color, the product must have less than or equal to 5g/100g of total sugar. To be awarded the amber color, the product must have a total sugar amount of more than 5g/100g and less than 12.5g/100g added sugar. The product receives a red color for sugar, if added sugar is more than 12.5g/100g. The traffic light label is placed on the front of the package, like the GDA label (Food 2007).

The categories tested in this comparative analysis are chosen based on the common critique of the GDA label.

Category	GDA label	Traffic light label
Calculation base	Per serving/Adult woman (2.000 Kcal)	Per serving/per 100g
Relevant for whom	Adult women	Most/all
Underlying assessments	No	Yes
Comparability	No	Yes
Health differentiation	No	Yes
Fast decoding	No	Yes/No
Added sugar reference	No/post-trail	Partially

<u>Calculation base:</u>

The GDA label is calculated per serving on behalf of a 2.000 Kcal diet, equivalent to an adult moderately active woman's needs. By using portion size to calculate the guideline values, without

uniform guidelines for portion sizes, the risk of unrealistically small portions are present. The traffic light label is calculated per serving and per 100g. The reference to nutrient content per 100g is more rigorous, as it will not fluctuate with the size of the portion. On the other hand, using two methods of calculation on the same label adds to the complexity of the label. The risk of an unrealistically small portion size is also there when using the traffic light hybrid label.

Relevant for whom:

I find that the information given by the GDA label is relevant for adult moderately active women. I base this on the notion that it cannot be expected of an average male consumer, that he has the ability to recalculate the information on the label, to correspond to his 2.500 Kcal diet. Especially when the short time used for decision-making in grocery shopping, is taken into account. This adds to the complexity of the label and to the risk of misleading consumers. The information on the traffic light label can be divided in two, the color coding and the per-serving data. The color coded information is relevant to any consumer, since the data is calculated per 100g. This gives an indication of the overall healthiness of the product. The other data is calculated on a per-serving basis. Since there is no single portion fitting all consumers, the relevance of this data fluctuates with the size of the portion. For example; babies need less salt than adults (Salt BBC).

Underlying assessments:

The GDA label does not assess or interpret whether the quantitative level of a nutrient is high or low. It simply presents the level of the nutrient relative to the portion and a 2.000 Kcal diet. It is left to the consumer to evaluate the level of any given nutrient. The traffic light label does interpret the level of most nutrients and in that way helps the consumer to decode additional information, and assess the level of each nutrient.

Comparability:

Because of the use of portion size calculation, and the earlier established varying portion sizes of substituting products, the GDA label makes it difficult to compare products. If portion sizes were fixed, it would assist the consumer in comparing products and making the healthier choice. Most GDA labels are calculated based on a 2.000 Kcal diet. But as shown earlier, GDA calculated based on a child's diet does exist. This adds to the complexity of the label and makes it increasingly difficult for the consumer to compare product's healthiness. The traffic light label makes it easy to

compare each nutrient on substituting products. This is possible because of the per-100g colored information in addition to the per-serving information. This adds to the usage of the label.

Health differentiation:

The GDA, as a stand-alone label, does not grant the possibility of assessing the healthiness of a product. First off, the changing portion sizes and calculation basis make it hard to compare products. Secondly, no information is given pertaining to the healthiness of the level of nutrients, or the overall healthiness of the product. This requires the consumer to be aware of what constitutes; a little and a lot, of any given nutrient. On the other hand, the volatility of the portion sizes opens the possibility for manufactures, to depict their product healthier or unhealthier by lowering or raising the size of the portion respectively. The traffic light label asses the quantity of each nutrient and tells the consumer if the level of the nutrient is high or low. This makes it easy for the consumer to quickly compare the levels of nutrients from one product to another. Hereby, the label assists the consumer in making a healthy choice, down to the individual nutrient. Even though the traffic light label also shows the level of nutrients on a portion size basis, the per-100g colored data makes it increasingly difficult for the manufacture to depict their product as healthier, by lowering the portion size.

Fast decoding:

In the earlier review of existing studies, I mentioned that consumers needed almost 10 seconds longer to decode the GDA label than the simpler labels. Included in the simpler labels was the traffic light label (Testing effectiveness 2006). The traffic light label tested by Feunekes et al is not identical to the label analyzed in this segment. Unlike the traffic light label presented in this analysis, the label from the study by Feunekes et al only contained the per-100g color coded symbols, and not the portion size information. It is therefore not possible to assess the difference in time taken, decoding the two labels, on the grounds of that specific study. The traffic light label does allow the consumer to decode the label quickly by only using the colors, but if information on nutrient content based on portion size is needed for the consumer, I see no reason to believe that the traffic light label offers a faster decodable option than the GDA.

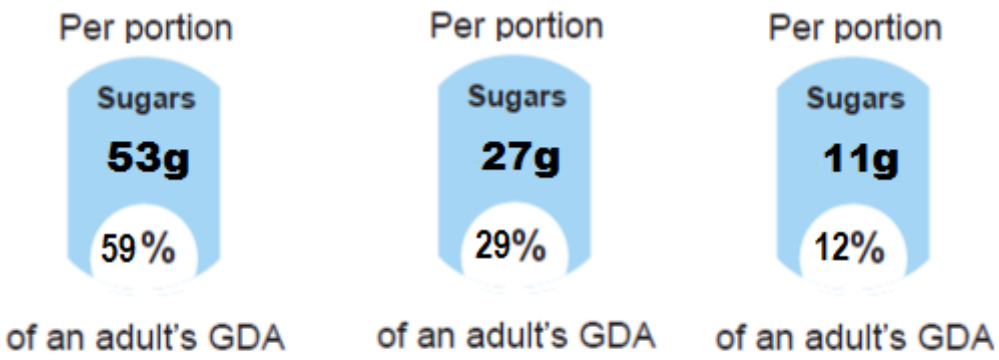
Added sugar reference:

The GDA label does not have a reference for added sugar. The GDA only references total sugar. In the earlier mentioned case of Kellogg's Coco Pops, Nordisk Kelloggs was forced to present sufficient information about the constructed reference value for sugar, to the consumer. This was decided in the light that the sugar content mainly consisted of added sugar (Notice of injunction 2008). But this decision only applies to Nordisk Kelloggs, and not all products with a sugar content mainly consisting of added sugar (Veterinary Complaints Board 2010). The traffic light label does not offer precise values for added sugar, but does take the added sugar level into account when awarding a product a color code for sugar.

Misleading potential:

It adds to the complexity of the traffic light label that two different methods of calculation are used. But rather that adding to the potential of misleading the consumer, I find that the addition of the per-100g values decrease the potential for misleading the consumer. Regardless how unrealistically small the manufactures make their portion sizes, the color coding will stay the same. Only per-serving is used in the GDA label's method of calculation. This I find has the potential of misleading the consumer. By lowering the portion size, manufacturers of products can depict their product as healthier. I have made the following illustration to clarify my point.

This illustration is based on 500 ml Coca Cola, but in principle any food item could be used. The guideline daily amount for sugar is 90g/day.



The first picture shows the GDA for Coca Cola when the portion equals the whole half liter bottle. The second picture shows the GDA for the same half liter bottle of Coca Cola, but the company has chosen to set the portion size to 250 ml. The last picture shows how the GDA label would look if the company chose to set the portion size to 100 ml. By lowering the size of the portion, I have created a healthier looking product. The size of the portion is shown on the product in close proximity to the GDA label. I do not think it can be expected of the average consumer, to take note of the portion size and multiply the numbers, till eventually ending up with the amount of sugar, corresponding with the amount of product, that the consumer intents to ingest. That is why I find it crucially important that the portion sizes are realistic.

Discussion:

Food labeling is used intensively far and near. It is harmonized throughout the European Union and compulsory if a nutrition claim appears on the package. But what is the purpose of the labels? The European Union describes the objective as to; guarantee that consumers have access to complete information on the content and composition of products, in order to protect their health and their interests (Europa EU). From this objective, it is safe to conclude that nutrition labeling is supposed to inform consumers on the content of the product. Furthermore it can be concluded that the information is intended to empower the consumer to make the "right" choice. The "right" choice is not necessary the healthiest choice, but the choice that supports the consumers interest or intention. The effectiveness of a nutrition label is therefore not the ability of the label to affect the choice of the consumer in a healthier direction. Rather it is the labels ability to communicate the content of a product clearly and effectively.

At the beginning of this thesis I explained who the consumer is. The consumer is the average reasonably well informed and reasonably observant and circumspect consumer. Preferably the average member of the target audience (DIRECTIVE 2005/29/EC). During the analysis of Kellogg's Coco Pops, it became clear that this definition is not used as firmly as the Unfair Commercial Practices Directive makes it seem. Even though the product is targeted at- and primarily used by children in the age group 4-14 years, the decision was made that, the information on the package label should relate to adults. This was decided by the Food and Veterinary Complaints Board in consideration of the usefulness of the GDA label. Had the Unfair Commercial Practices Directive been followed to the letter, then the GDA label would become increasingly complex and lose its usefulness (Veterinary Complaints Board). This begs the question; is the GDA

labeling scheme more important than the Unfair Commercial Practices Directive. For this question I have no objective answer, I can only say that my opinion differs from the Food and Veterinary Complaints Board.

I have described the GDA label as a descriptive label, and indeed it is. In fact, it was illustrated in the literature review, that it took participants almost 10 seconds longer to evaluate products equipped with the GDA scores, than simpler normative labels (Testing effectiveness 2006). It is straightforward to assume that the extra time is needed because of the extra information supplied, relative to the normative labels. So what does the GDA label bring to the table that the standard normative label does not? The answer is the guideline daily amount, a calculation of the nutrient content as a function of the portion size chosen by the industry, and an adult woman's daily requirements. As shown in the focus group interview, this information can be complicated to decipher. Time is not on the side of the consumer. When assessing a product in the supermarket the consumer uses around 2 seconds (Teknologisk Institut). So are the values for guideline daily amount necessary and helpful to the consumer? In the light of the limited scientific data presented in the literature review, the analyzes undertaken in this thesis and the purpose of nutrition labels statement from the EU, my answer is no. The values relating to an adult woman's daily need of nutrients does more harm than good. The use of portion sizes adds to the confusion and deducts from the usefulness. The reasoning behind the usage of portion sizes is that no consumer eats 100g of every product every time. While this in all likelihood is true, it does not pertain to the objective of the matter. Instead the argument nears a logical fallacy. The fact that consumers do not eat 100g of every product every time does not make differentiated portion sizes a more useful measurement. As shown in the assessment of the validity of NHF's criticism on portion sizes, differentiating portion sizes on substituting products do exist. The focus group interview stated, in line with the common critique in the literature review, that comparability is an essential feature of effective nutrition labels. Comparing two products both equipped with the GDA label and different portion sizes, requires additional time and effort. Time the consumer does not have or is not willing to give to the subject matter. Furthermore, letting the industry come up with the portion sizes significantly lowers the credibility of the label, as shown in the focus group interview. The loss of credibility can be traced to the industry's opportunity to beautify their product, by lowering the portion size, as shown in the comparative analysis.

Basing the GDA on an adult woman's daily nutrient requirement has proven to be the source of much discontent, and rightfully so. At its core it is contradictory to the European Union's own goals for labeling food stuff. The European Food Safety Authority's Panel on Dietetic Products, Nutrition and Allergies, found that the 2000 kcal labeling reference intake for energy, is consistent with dietary advice for the general population, on avoiding excess intakes of energy and nutrients. But this should be irrelevant. Had the purpose of labeling food stuff been to correct or adjust the consumer's intake of nutrients, then the argument would have been to the point. But the purpose is to inform the public, not to regulate their behavior, at least not according to the European Union (Europa EU). By using an adult woman as calculation basis, the label loses much of its usefulness for people not included in that population. Furthermore, when the reference person is not used uniformly across products, as shown in the literature review, it adds to the complexity of the label and makes it harder to compare the nutritional value of products.

Advice and recommendations:

The Unfair Commercial Practices Directive explains, that to deem a business practice action misleading, there is no need to prove a financial loss, the possibility of deception alone can be misleading. These recommendations are given to lower the possibilities of deception relating to the GDA label.

Relating to the portion size:

The fact that portion sizes change on substituting products is a serious issue for the GDA label. It makes it hard for the consumer to compare products. By being able to compare products, the consumer can make his or her choice on the basis of exact knowledge. To ensure that this option is present, the GDA label needs uniform portion sizes. It was mentioned by the focus group that the listing should be based on per-100g of the product. This would in turn reduce the potential for misleading the consumer. Alternatively different product categories could be applied with the same portion size within the boundaries of each category. This however, would not be sufficient to remove the possibilities of deception, as seen in the case of Kellogg's Coco Pops. In that case, the GDA label gets its misleading properties *because* of product categories. Although marketed and used mainly by children, the product falls into the category of cereal, instead of sugared cereal. These types of wide-ranging categories are not desirable. They give way to a distinction of

bordering products that does not fit unequivocally into any of the categories. To lower the possibility of deception, I recommend that the values on the GDA label should be based on 100g.

Relating to the reference person:

The reference person is at the core of the GDA label's structure, and from which the label has taken its name. Nevertheless, I find the percent values for daily intake to be useless at best. I base this on the notion that the majority of the European population is not 40 year old moderately active women. I will further argue that even if that was the case, the values still adds to the complexity of the label. When trying to communicate information in a very limited time, simplicity is preferable. By removing the guideline daily amount expressed in percentage, the core of the label would disappear. I find that this does not take away from the justification of the label, but adds to its legitimacy, by letting the label communicate loud and clear.

Redirected development:

By making the changes above, the GDA label will become increasingly simple in its expression. In order to support the expression of the label, colors could be included. Three easily distinguishable colors accompanied by the words low, medium and high would make the label easier to decode at a glance. This would advance the label from descriptive to the category of hybrid labels.

By making the above mentioned changes to the GDA label, it would be more easily decodable and the possibility of deception will be significantly lower. The price of these changes is that the GDA label loses its core competence, but gains a new one more suitable for front of pack labeling schemes.

This is an example of what the GDA label could look like if my recommendations are followed. It is important to stress that the words relating to the colors are very important. Evidence from the literature review suggests that great confusion will arise if the words are removed.

Conclusion:

The use of nutrition labels are harmonized throughout the European Union and compulsory if a nutrition claim appears on the package. The Unfair Commercial Practices Directive gives a uniform view of unfair commercial practice, by replacing member states' existing general clauses in the area, thus providing a single European reference point, to witch commercial practices are allowed and which are not. The practice is considered misleading if it contains false information, is likely to deceive the average consumer or is likely to cause the average consumer to take a transactional decision that he would otherwise not have taken. To deem a business practice action misleading, there is no need to prove a financial loss, the possibility of deception alone can be misleading. The Unfair Commercial Practices Directive takes the average consumer as a benchmark. The average consumer is reasonably well informed and reasonably observant and circumspect. If a commercial practice is aimed at a specific target audience, it is desirable that the effect of said commercial business activities be assessed, from the perspective of the average member of the specific target audience.

Today the front-of-pack GDA scheme includes; energy, total fat, saturated fat, carbohydrates, sugars and salt. The GDA label refers to the optimal intake of a moderately active woman of forty, though not uniformly. In the assessment of the NHF's criticism of the GDA scheme, I found an example of a child's GDA used instead of an adult's. The GDA label is based on portion sizes, but as I found in the literature review, portion sizes change among substituting products. The portion sizes are set by the industry and not by a legal authority. I have shown in the comparative analysis that lowering the portion size of a product can make it look healthier.

The GDA label belongs to the category of descriptive labels. It takes on average 10 seconds longer to decipher the GDA label than the simpler normative labels.

It is found in the literature review that claims and truncation independently contribute to a positivity bias and induce a halo effect. This was supported by the focus group interview.

Most criticism of the GDA label revolves around the lack of minimum, average and maximum values, the one adult figure and the changing or unrealistic portion sizes. All these points of criticism were supported by the focus group interview. I have deemed these three properties of the GDA label likely to deceive the average consumer.

The Danish Consumer Council has reported Kellogg's Coco Pops to the Danish Veterinary and Food Administration, under the Danish Ministry of Food, Agriculture and Fisheries for misleading labeling related to the Guideline Daily Amount. The points of criticism raised in the accusation of misleading practices towards Nordisk Kelloggs, are in line with the criticism raised in the literature review and supported by the focus group interview. After identifying the points of complaint in greater detail, the subsequent judicial decision and complaints hereof, I analyzed the semiotic cocktail of the product, concluded that the Notice of injunction was followed and suggested ways of heightening the transparency of the product.

The focus group interview yielded interesting insight into the difficulty of decoding the GDA label.

By making a comparative analysis of the GDA label and the hybrid traffic light label, I assessed positive and negative properties of the two labels. The positive and negative properties of the two labels formed the basis for my later recommendations for changes to the GDA label.

The GDA label as we know it today carries the potential to mislead the average consumer. Changing portion sizes and the reference person are at the core of the GDA label's design and at the same time the main source of deception. My advice is to retire the portion size and instead use a calculation based on per-100g servings. It is also my advice to retire the moderately active adult woman from the label, since her presence lowers the usefulness of the label and adds to the complexity. Lastly I recommend that colors accompanied by the words low, medium and high are added to the label. This will in turn make the label easier to decode at a glance.

Summary:

The use of nutrition labels are harmonized throughout the European Union and compulsory if a nutrition claim appears on the package. The Unfair Commercial Practices Directive gives a uniform view of unfair commercial practice, by replacing member states' existing general clauses in the area, thus providing a single European reference point to witch commercial practices are allowed and which are not. The practice is considered misleading if it contains false information, is likely to deceive the average consumer or is likely to cause the average consumer to take a transactional decision that he would otherwise not have taken. Today the front-of-pack GDA scheme includes; energy, total fat, saturated fat, carbohydrates, sugars and salt. The GDA label refers to the optimal intake of a moderately active woman of forty, though not uniformly. The GDA label belongs to the category of descriptive labels. It takes on average 10 seconds longer to decipher the GDA label than the simpler normative labels.

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Annex 1

Focus group data:

Respondents' names and gender:

Mikkel Kasper Lauritzen, male

Jeppe Andreas Rose, male

Jacob Lorantzen, male

Pei Li Pedersen, female

Tina Nielsen, female

Transcription of the focus group interview;

Each statement is initiated by the first name of the respondent expressing the statement.

Moderator: Velkommen til fokus gruppe interview, jeg vil gerne bede jer alle sammen sige jeres navn hele vejen rundt og så starter vi derefter.

Tina: Jeg hedder Tina

Mikkel: Jeg hedder Mikkel

Jacob: Og jeg hedder Jacob

Jeppe: Jeg hedder Jeppe

Pei-Li: Og jeg hedder Pei-Li

Moderator: Det er meget fint – velkommen alle sammen og tak for hjælpen, her har jeg anrettet tre potionsstørrelser af et kendt sukret morgenmads produkt. Hvilken portion svare overens til den portion i normalt ville spise af et lignende produkt

Jacob: Ikke nogen af dem

Moderator – Ikke nogen af dem?

Jacob: Jeg ville tage en større

Jeppe: Ja større

Jacob: Meget større

Moderator: Er de alle sammen for små?

Jeppe: Jah

Mikkel: Ej jeg tror at den største passer meget godt på hvad jeg ville… hvis jeg skulle spise det produkt, hvilket jeg ikke skal.

Pei –Li: Jeg ville tage dem midterste

Tina: Jeg ville også tage den midterste

Jeppe: Jeg ville helt klart sige at der er for små

Jacob: Ja

Moderator: De er alle tre for små?

Jeppe: Ja

Moderator: Og du tager den største?

Mikkel: Ja jeg tager den største, den kan jeg meget godt

Moderator: Ok, så vil jeg hører jer om i har set det her label før? Vi kan ligge det på midten af bordet så alle kan få lov at se

Mikkel: Ja

Jacob: Ja

Pei-li: Ja

Jeppe: Ja

Tina: Ja

Moderator: I er stødt på det før alle sammen?

Mikkel: Ja

Jeppe: Ja

Moderator: Er der nogen af jer der ikke er stødt på det før

Pei-li: Jeg ved det ikke, jeg plejer ikke at kigge efter dem

Moderator: Nej?

Jeppe: Jeg tror at jeg har set det før, det minder om noget man har set før

Tina: Ja

Moderator: Ja ok, øhh lablet der hedder Guideling daily amount - er det et label i bruger?

Tina: Nej

Pei-li: Nej

Jeppe: Hvad tænker du på- altså om man læser det eller kigger på det eller hvad mener du med at bruge?

Moderator: Jamen altså om du drager en eller anden form for nytte af det ved indkøb

Jeppe: Ja, det mener jeg at jeg gør

Moderator: Ja?

Jeppe: Eller jeg tror i hvert fald at jeg gør det ikk… jeg har en eller anden idé om at det der står på indikere på en eller anden måde hvad der indgår i produktet, om det er godt eller dårligt

Jacob: Jeg kan også nogle gange bruge det, hvis nu at, hvis man tænker, hvis man føler sig sund i en periode

Latter

Jacob: Altså det er jo ikk altid jeg gør det men nogen dage skal lige være lidt sund og træne, og så kigger jeg på .. tror på kalorier. Hvis der var to kager ikk' og den ene var der lidt færre kalorier i, så tager jeg den, ungefer, så føler jeg mig sund… men kigger ikke på nogen af de andre ting… bare kalorier, ved ikke om jeg kigger bagpå eller på den der hvor det står, men hvis den der er den jeg ser først så er det nok den jeg vil bruge

Mikkel: Jeg bruger ikke…. Kalorie antallet sige mig ikke så meget og jeg ved ikke hvor meget det er, det anbefalet daglige antal kalorier, men fedt procenten og sukker procenten er noget jeg mange gange har stået og studeret og forholdt mig til i forhold til de der 100 grams serveringer som de bliver opgjort i

Tina: Jeg har faktisk også. Jeg bruger ikke lige den her, men jeg bruger bagpå hvor jeg læse om kalorier og jeg forholder mig til hvad der er i men jeg bruger ikke de der procenter.

Moderator: Så hvis vi går en lille smule væk fra det der mærke, dét mærke – GDA ordningen – går ind under den type mærkningsordning der hedder front of package labels, det vil sige at det er … labels der sidder på forsiden af produktet i stedet for på bagsiden som de normale nærings deklarationer oftest gør. Vil i sige at når i vælger produkter i supermarkedet, at i bruger front of package label ordninger?

Jeppe: Jeg kan ikk.. jeg tænker mest over at det er noget der sidder på bagsiden, jeg har ikke tænkt over at det er noget der sidder på forsiden og så tillagt det nogen speciel værdi, som om det skulle betyde noget, jeg tror mere bevidst bare på mærket, og kigger generelt efter det, så det ved jeg ikke rigtig

Mikkel: Sådan har jeg det altså også lidt, hvis øhh - hvis det noget, hvis jeg er inde i en sund periode så kigger jeg efter det men om det sidder på bagsiden eller på forsiden det er ikke rigtig den

store fordel for mig, fordi at det… enten er jeg bare ude og handle og så leder jeg efter det der har en lav fedt procent eller så noget og så kigger jeg foran eller bagpå

Moderator: Lad os sige at i ikke har en sådan sund periode så i køber hvad der, hvad i har lyst til, hvis i så bliver præsenteret for et sådan label på forsiden af produktet vil i så ligge mærke til det eller ville det være underordnet?

Tina: Det ville være underordnet for mig, for jeg kigger på det alligevellet

Moderator: Ok

Tina: De fleste vare jeg køber, ikke alle, ikke hele tiden, hvis det er en ny vare jeg køber så tjekker jeg altid, hvad er det lige der er i det her

Moderator: Ville du tjekke bagsiden selvom den der er på forsiden?

Tina: Øhhhhhhh ja, det tror jeg ja, jo eller er det kun 100g den der plejer at sige, nogen gange pjejer den også at sige…

Moderator: Dén der siger per 100g

Tina: Ja

Moderator: Per 100g serving

Tina: Altså jeg tror at jeg ville kigge alligevel, også for at se hvad der var i den af kostfibre og proteiner og hvad der ellers er, det der er jo ikke det hele

Moderator: Ville i andre vende pakken om og kigge på varedeklarationen hvis den der er udtryk for næringsværdien på forsiden

Jacob: Det tror jeg ikke, også fordi, ej det tror jeg ikke

Jeppe: Bare sådan en ting man lige snupper, så tror jeg sq heller ikke jeg ville få noget ud af det altså, det vil jeg næsten tillægge det en ekstra værdi eller en plus værdi hvis de sætter den på forsiden, ligsom reklamer du ved, vi har ikke noget at skjule ikk, hvor man tænker i er sikkert nogle rigtig søde drenge ikk, men det tror jeg ofte man bliver påvirket af og agere på, man tænker nåh ! sådan er det jo så må det være fint nok ikk men

Mikkel: Jeg tor stadig jeg ville kigge efter nærings deklarationen, i og med at de sætter det på forsiden vil jeg tænke det er noget de prøver at prale med og det ikke er sikkert at det nødvendigvis forholder sig sådan eller at det i virkeligheden er så sundt som det bliver fremstillet, jeg vil altid gå efter indholdet, og se en eller anden standardiseret format som f.esk den der per 100 gram, man tænker at de skal overholde nogle lovkrav og det er på en eller anden måde ting man kan sammenligne på tværs af produkter. Ting der er på forsiden vil jeg tro var salgsfremmende og noget virksomheden selv har lavet selv sat på.

Moderator: Hvordan forholder i jer andre til det – mener i at næringsdeklarationen på bagsiden eller en sådan øøh deklaration på forsiden forholder sig mest til virkeligheden, hvilken af dem vil i umiddelbart troforholdt sig bedst til virkeligheden?

Tina: Jeg ville gå ud fra at det er det samme, jeg vil ikke gå ud fra at det der stod på forsiden var anderledes end det der stod bagpå, men som sagt jeg ville kikke bagpå fordi der står flere ting

Jeppe: Jeg har fået at vide at de fleste ting står bagpå, man har fået at vide at de skal stå der ikk, så man har en rutine så man automatisk tjekker den

Jacob :Jeg tror nu det med den der kom på, bare fordi jeg har hørt om det… er det ikke noget lovkrav efterhånden er det ikke sådan blevet….

Moderator: Det er en frivillig mærkningsordning i EU

Jacob: Ok ok, så jeg ville stole ret meget på det tror jeg, jeg tænker at det er sådan noget

Moderator: Er det i takt med at man set mærket mere at man har mere tiltro til den? Altså på flere produkter

Jacob: Det kan godt være

Jeppe: Man bliver gjort opmærksom på ved mange produkter… OU ! der er kun SÅ lidt fedt i sp tænker man gad vide så med det jeg indtager normalt og sådan noget bliver man jo bombarderet med hele tiden, produkter der kan det ene og det andet og flere kostfibre – Ihh det er så sundt og alt muligt og jeg tror det er den vej igennem man bliver påvirket til at overveje hvad fanden der egentlig er i den te eller leverpostej eller hvad man nu… pølse hvad er der så i den, siden den anden er så meget bedre

Moderator: Jeg vil gerne spørge jer om hvordan i forstår det der mærke, kig på det, og fortæl mig hvordan i forstår mærket

Jacob: Øhm

Mikkel: Jeg forstår det sådan at vi har 100g af en eller anden vare, dermed burde alt være gjort op i vægt, det er det også kan jeg se, undtagen kalorier, det er energi øøh, men så ville jeg gå ud fra at der så, hvis vi har 100g af den her vare, er der 10,5g sukker men allerede der er det lidt underligt for 10,5g er jo ikke12% af 100g

Jacob: Men er det er det?

Mikkel: Derfor, det undrer jeg mig over, men det er ikke noget jeg faktisk har bemærket før jeg bliver bedt om det nu, jeg har bare kigget på gram i forhold til de 100 gram, det er ikke tillgat prosent satserne

Jacob: 12%, er det ikke bare af dit daglige indtag, hvor meget man må indtage, per 100g så er der 10,5 gram, det er 12

Mikkel: Ok, er det er det

Jacob: Daily amount, hvis du æder 100g af det der så får du 12% af dit sukker

Tina: Ja det havde jeg egentlig også

Jacob: Og kalorier

Tina: Altså jeg vil sige at at som jeg også sagde før, jeg kigger ikke på procenterne, jeg skal have meget mindre end en normal voksen,

Jacob: Ja

Tina: Præcis, der er mange, meget forskel på alder vægt højde drøjte og jeg ved ikke hvad for hvor mange kalorier man skal ha for en dag, så de der procenter siger ikke mig noget som helst dem vil jeg ikke bruge

Moderator: Er der ingen af jer der ville bruge procentsatsen

Jacob: Hvis nu jeg ligger og ser paradise hotel en hel dag og ikke laver noget, så skal jeg jo nok ikke have så meget som hvis jeg nu løber 10 kilometer og er på arbejde i 12 timer, så vil jeg nok mene at…

Moderator: Lad os gå lidt ind i de der pct satser, hvad mener i at de procent satser repræsentere?

Jeppe: Jeg tor det samme som Jacob

Moderator: Som feks sukker, der står 10,5 gram sukker, 12% hvad betyder de 12 %?

Jacob: Jeg tror det der med det svare til at du får 12% af dit sukkerbehov dækket

Jeppe: Det virker bare som ret meget ikk

Mikkel: Men det

Jacob: Jo

Mikkel: Sukkerbehovet for en voken mand, en stor fuldvoksen mand der, går jeg ud fra for det vil give den laveste procent sats

Jacob: Og det er vel alle former for sukker om det så er frugtsukker eller sådan hvid sukker eller hvor fanden, mælke sukker

Mikkel: Jaja

Jacob: Og alt så noget ikk

Jeppe: Det giver ikke nogen mening for det er utrolig lidt fedt vi skal have meget mere fedt end det

Jacob: Er det lidt fedt?

Jeppe: Ja vi skal da have rimelig meget mere fedt i vores daglige kost end to %

Jacob: Ej men det der % det er 1,6

Jeppe: Var det ikke % satsen vi skulle kigge på

Jacob: Jo men så tænker jeg også der der 1,6G svarre til 2% af det fedt du skal have

Jeppe; Nåh på den måde ååh ok

Moderator: Er % satserne udtryk for max eller min

Mikkel: Jeg tror de er udtryk for en eller anden form for anbefaling fra en eller anden form for indsats der, sp er tolket i en virkelig fordelagtig retning for at få de der % satser til at se lave ud

Moderator: Vil i sige at % satserne er udtryk for, hvis de var på 100%, den optimale indtag af hver nærringsstof

Tina: Jeg kunne forstille mig at det var minimum altså at ja og maksimum

Jacob: Max ikk sådan så at

Tina: Ja maksimum

Jacob: Sådan at den virkelig kan

Jeppe: Hvis en Mars bar var minimum

Pei-li: Kan det ikke være sådan gennemsnittet siden det er en guidling, siden de kalder det en guideline

Tina: Altså jeg vil tro sådan som jeg i hvert fald synes man hører hele tiden så skal en kvinde have 2000 kcal og en mand skal have 2500 kcal, det sådan de, det forbrug jeg har hørt, bare sådan det generelle

Jeppe: Ja

Tina: Øhh at det så kan variere fra person til person det er så noget andet ikke men jeg ville sige at lige ud fra den som vi ser på her, der sys jeg at den vildleder lidt ved at sige at sukker, altså der er kun 12% sukker i den her men sukker går ind under kulhydrater altså, alt, det er ikke kun sukker man får, det er ikke fordi man må få 100% sukker, man må ikke få 100g sukker om dagen, der er en masse andre ting, man må få kulhydrater, der er også en masse andre ting der hører ind under kulhydrater

Jeppe: Mmh

Mikkel: Sad der ikke noget protein

Tina: Nej jeg ved ikke hvad de har betydet

Moderator: Fortrækker i at en næringsvejledning er opgjort per 100g eller per portion af et produkt

Jeppe: 100g

Jacob: 100g

Mikkel: 100g

Tina: 100g

Tina: Som blev sagt før, så får man en øhh så har man et tal man kan sammenligne, på tværs af altså

Jacob: Portionsstørrelse er også latterligt, for hvis du skulle, Coco Pops f.eks. en portion Coco Pops, det er også bare sådan en, sådan en lille bitte portion, 30g eller sådan noget ikke, det kan man ikke bruge til noget

Moderator: Nu er det usædvanligt at GDA mærkningen er opgjort per 100g, normalt er den opgjort per portion, f.eks er gda mærkningen fra for Kellogg's Coco Pops opgjort per portion

Jacob: Det står også på GDA mærkningen

Moderator: Det står også på GDA mærkningen, eller i hvert fald tæt på GDA mærkningen, Hvilken af disse 3 portioner tror i at Kelloggs mener er svarende til den portion den gennemsnitlige forbruger af produktet bruger

Mikkel: Jeg tror den mindste

Pei-li: Mindste

Tina: Ja

Jeppe: Det tror jeg også

Jacob: Måske den mellemste, det er ikke den store i hvert fald

Moderator: Er det retvisende

Tina: Nej

Mikkel: Nej

Jacob: Nej

Jeppe: Den er også henrettet, ikk henrettet, det lyder forkert, den der maidet mod små børn typisk, det ved jeg ikke, det ved jeg selvfølgelig ikke men altså, man kan jo godt forstille sig at der er flere børn der spiser det end voksne, næsten ik, så man kan sige at den passer nok bedre til børn ikk i hvert fald, end til en voksen

Tina: Men

Jeppe: Så

Tina: Men hvis det den her, så står der jo voksens, en gennemsnitlig voksen, ahmen jeg mener bare at det kan godt være at det er hvad de mener et barn skal

Jeppe: True

Tina: Ja , altså, det er rettet mod voksen

Jeppe: Men jeg tror det er det vi camouflere den bagved altså

Tina: Jaja

Jeppe: For den lille portion ser tallene nemlig så pæne ud ikk

Tina: Jaja

Jeppe: Fordi man kan sige nåh ja men, små unger skal spise det

Moderator: Hvilken voksen, som i siger, mener i at GDA mærkningen er baseret på

Tina: gennemsnittet

Mikkel: Jeg vil tro det er en voksen mand

Jeppe: Ja

Mikkel: På 80 kilo

Jeppe: Ja

Tina: Nåh ja ok ja ok jeg tror der er jo både kvinder og mænd, jeg tror også det er en mand

Pei-li: Jeg tror den gennemsnitlige, ellers kan man ikke kalde det for guideline, for guideline siger at der er lidt rum at være i at boltre sig i så

Moderator: GDA mærkningen er udregnet på baggrund af en voksen kvinde, moderat aktiv, på omkring de 40, hvilket svare til en diet på 200 kcal om dagen. Mener i at skiftende portionsstørrelser på substituerende produkter kan være et problem

Mikkel: Ja

Jacob: Ja

Mikkel: Hvis det ikke er et krav at man opgør i forhold til en eller anden standard, f.eks 100g så sys jeg det er et problem at hvis man begynder at opgøre per portion og ikke.. prøver at gøre det mere tydeligt hvor mange gram, hvor stor en mængde en portion er, så sys jeg det er et problem

Jeppe: Det virker i hvert fald som om man prøver at gemme noget eller camouflere det når det er på den måde

Tina: Ja få noget til at virke sundere end det egentlig er

Jeppe: Ja præcis

Tina: Ja

Jeppe: Fordi at ja, det er jo det jeg sidder og sagde

Pei-li: Jeg synes det er rigtig misvisende det er også en af grundende til at jeg aldrig kigger efter dem for jeg er bare… jeg sys lidt at man fare vild i det til tider

Tina: Så grunden til – nu ved jeg så ikke – er det lovpligtig at man har varedeklarationen på alle vare i Danmark eller EU

Moderator: Ja man har næringsdeklarationen

Tina: Ja. Fordi at så får man jo deklarationen der, det er nok også derfor jeg altid kigger dér, for så ved jeg at det altid er samme måde det bliver målt i

Moderator: Kan i huske at når i er stødt på et produkt med et sådan label at i har orienteret jer om portionens størrelse

Jacob:Det har jeg

Tina: Ja det har jeg også

Jacob: For jeg tror nemlig jeg har gjort det med sådan noget Coco Pops, det er lidt sørgeligt ikk men, der stod at det var 25g eller 30 20 eller 30g jeg kan ikke huske, jeg købte den der cocopops og tænkte sådan, jeg kommer til at spise halvdelen inden der er gået 2 dage, så har jeg spist 200g eller sådan et eller andet ikk, det var sådan, så det kan jeg nemlig huske at jeg studsede meget over at det var 25g.

Mikkel: Det siger mig et eller andet med de der 30g, jeg har tænkt det passer i hvert fald ikke

Jacob: Nej det passer i hvert fald ikke

Mikkel: Men jeg købte det alligevel altså

Latter

Jeppe: Men så har du også været bevidst om at det var der ikke… mere det der med hvis man ikke ved det ikk

Jacob: Så er det bare spild af tid og penge på en eller anden måde

Jeppe: Hvis de ikke overholder en eller anden form for standard, så hjælper de ikke med noget altså, det er jo for at beskytte forbrugerne i de fleste tilfælde ikke?

Tina: Men altså jeg vil stadig mene at det ikke var retvisende det, jeg ville stadig stole på hvad der stod, undtagen procenterne, men jeg ville ikke gå ud fra at det her det ville hvad kan man sige , de tal der var der ville jeg tro på er rigtige, at det så er en anden mængde eller noget man… jeg ville tro på at det var fuldstændig det samme som der stod på bagsiden, eller, de tal man vælger at tage frem her, dem kan man også vælge at finde på bagsiden.

Moderator: Det lyder som om at portionsstørrelserne der henholder sig til udregningerne af tallene på GDA mærket, at hvis de ændre sig, så har det en eller anden form for signifikans, altså ændre sig mellem flere forskellige produkter

Mikkel: Ja

Tina: Det bliver svære at sammenligne, hvis Kellogg sætter en portion til25 og Frosties har en på 30% eller på 30g, så sys jeg det.. så kan man jo ikke rigtig sammenligne det.

Mikkel: Jeg er helt enig

Jacob: Yes

Moderator: Er det vigtig for jer at en næringsdeklaration kan bruges til at sammenligne produkter eller er det vigtiger at den kan give jer et reelt indblik i hvad en portion af et produkt reelt indeholder?

Jacob: For mig der det der med at sammenligne, jeg kan godt selv sammenligne bare på de100g så jeg sys ikke jeg skal have en portion, så jeg kan godt bare se om der 200 eller 4-500 kalorier per 100 gram eller 300 så kan jeg godt sammenligne, i stedet for at man skal sammenligne portioner

Mikkel: For mig er det også mere noget med at sammenligne end det er med at få information om hvor sundt produktet er, fordi jeg ved godt, fortæller jeg mig selv i hvert fald, hvad der er sundt, og det der er sundt er som regel noget der ikke er blandet sammen af alt muligt, det er som regel grøntsager og sådan noget. Det er sjældent jeg, sundhedshensyn står og vælger en hønsesalat nede i netto, men jeg kan da godt tage de forskellige hønsesalater og så se at den ene den har rent faktisk 30% fedt og det kan så gøre at jeg vælger den anden. Men det er ikke noget der sådan grundlæggende giver mig en følelse af at jeg ved hvor sundt det rent faktisk er, det produkt jeg køber

Det er jo også noget af et projekt hvis de alle sammen har forskellige, på ikk - på en eller anden måde, at det ikke r til sammenligning så er det jo et kæmpe stort projekt hver gang man skal ud og handle for hvis man også skal regne portionerne om og finde ud af … altså… så kan du stå i supermarkedet i en evighed. Og det er jo bare et eller andet stop på vejen hjem, man skal igennem for de fleste

Jeppe: Især hvis du tager stilling til det

Pei-li: Mmh

Tina: Jeg vil sige jeg bruger det til begge dele, bådet til at finde ud af hvad der er i vare og så også til sammenligning hvis man står med 5 forskellige mærker. Så kan jeg finde ud af hvad der er det bedste… for mig

Moderator: Nu hvor den her type mærkningsordning er baseret på portionsstørrelser og skiftende portionsstørrelser, hvem mener i så bør fastsætte de her portionsstørrelser, som virksomhederne bruger

Jeppe: Men er det ikk et krav for EU at de eller en frivillig mærkningsordning fra EU

Moderator: GDA er en frivillig mærkningsordning fra EU

Jeppe: Det kunne være interessant at få dem til at sige at det skal overholde visse krav. Altså det ville da være rart, hvis man f.eks. er i udlandet og ikke forstår indpakningen, det er ikke altid man lige kan se et eller andet på spansk hvad det betyder men man kan måske se, nåh ok en eller anden lever paté eller whatever man ligesom kan kigge på det og se om det er en god eller dårlig ting, det kunne være fint hvis der var en eller anden form for begrænset international form for standard ikk

Tina: Men jeg tænker lidt øh om man selv må bestemme hvad man vil have stående her… jeg tænker også at det ville være ret rart hvis man nu stod i Spanien og så ville det være rart hvis det var de samme ting der stod her

Jeppe: Selvfølgelig

Tina: Ja nummer 3 det er kalorier eller et eller andet. Men hvis man selv må bestemme hvad der er med de der 4-5 ting, og man selv måtte bestemme om man ville have proteiner eller sukker, så bliver det måske lidt svære end det er i forvejen

Jeppe: Det skulle helt klart optimeres lidt, altså stilles nogle strengere krav til den ikk, lige nu virker det bare som en god idé vi er ved at sætte i søen o håbe på vi får optimeret lidt senere hen ikke

Pei-li: Men det må jo også være en instans uden for virksomheden de på en eller anden måde må

Jacob: JA !

Pei-li: Altså sætte de her rammer ikke, ellers mister mærket fuldstændig sin troværdighed

Jacob: DET tænker jeg også, men det går jeg da også nærmest ud fra, er det ikke sådan eller hvad at det eller er det… det går man nærmest bare ud fra at det på en eller anden både, portionsstørrelser på en eller anden måde er det…

Moderator: Fødevareinstituttet?

Jacob: FØDEVAREINSTITUTET ! et eller andet som gør det

Tina: Men så tænker jeg også lidt at hvis man nu har Coco Pops og corn flakes, altså, de har meget forskellige, eller det ved jeg så ikke om de har meget forskellige øhh sukker, lad os lige… sukker

indhold og man så vil tage det ud fra begge to 30g eller om man vil tage det ud fra, ahmen der må max være 12 % sukker i en portion, forstår i hvad jeg mener?

Mikkel: Nej

Jeppe: Næh

Tina: Altså om det skal være ud fra hvor mange gram der er i en portion eller om det skal være ud fra hvor mange %er at det her hernede af en daglig indtagelse der må være i en portion. Fordi at hvis der er noget med mindre sukker i, men at en portion godt må have 12% sukker af daglig indtag, så vil det jo være en større portion i forhold til…. En sund vare ville ikke have så meget sukker… frugtsalat er der meget frugtsukker i ikk… ja ikk…

Jacob: Jeg synes bare at hele det der med portion det er så abstrakt på en eller anden måde jeg synes det er helt, det er bare min mening omkring det, at det kan man overhoved ikke gøre, for der er så stor forskel på hvor store portioner folk spiser, det er helt ude i hampen

Jeppe: Tænk hvis det var kartofler, det ville være helt underligt

Tina: Jamen det er det

Jacob: Jeg synes det er helt mærkeligt at man skal, det kan man slet ikke bedømme… så

Tina: Det eneste jeg tænker det er at som der måske ville være meget godt ved det der, at man ser hvad en portion egentlig er, at man ikke skal tage den store, eller det ved jeg ikke, nu fik vi jo ikke svar på hvad for en det var, men at man ikke skal tage alle de her tre skåle sammen og så tro at det er en portion

Jacob: Ja hvis der er sådan nogle retards

Latter

Tina: Jaja præcis

Jacob: Du skal nok ikke gå hjem og så spise halvdelen af den her med sødmælk på fordi så har du overskredet et eller andet,

Tina: Ja på den måde kan jeg godt se at det er en meget god idé at have portion

Jacob: Ja

Tina: Ja

Jeppe: Men samtidig hvis du ikke selv – det er lettetre at lære folk at forholde sig til 100g, det er et dejligt rundt tal og vi kan nemt gange det op og ned frem og tilbage og sådan noget ikke…

Tina: Ja

Jeppe: Det kan du ikke med 25 og så 30 og det ene og det andet ikke

Tina: Det er ikke så nemt i hvert fald

Jeppe: Og det vil sige, nej det er i hvert fald ikke så nemt og netop som også blev sagt, hvis det måske skal tage 3 eller 30 sekunder max at beslutte hva for en vare du tager nede i supermarkedet, så skal du jo ikke begynde at så og regne de ting ud, der skal du jo bare lære forholdsvis hurtigt, de 100g og så er der ikke mere at rafle om, og så kan du hurtigt finde ud af hvordan og hvorledes

Moderator: Taget den korte tid i betragtning som vi bruger til at handle dagligdagsvare, mener i så at et sådan FOP mærke som GDA's formål skal være at give forbrugeren et indtryk af hvad der er i varen eller at regulere forbrugerens forbrugsvaner

Jeppe: Jamen øhh, det skal give dem et indtryk af hvad der er i varen og så må de selv være gode nok til at vurdere og selv bestemme hvad og hvor meget de så selv skal have, for ellers har de ikke en mulighed for at tage en beslutning selv altså, så frarøver du den mulighed for at de selv må lave deres mad og alt muligt, det er misvisende også, hvis du så lige pludselig siger at du skal beskytte alle for pølsen her den er farlig, så vi skruger lige lidt rundt på tallene så den er mere nem for brugeren at om det er en god eller dårlig. Det skal så fremgå at et andet mærke at det her ikke er særlig sundt, men det her er hvad der er i. Du må ikke begynde at rette på de tal, så kan du ikke bruge det i noget som helst… og hvem bestemmer.

Jacob: Ligesom på smøgerne så kunne man bare lave et billede af sådan nogle sidsygt fede mennesker, sådan nogle der sidder i vogne, med hjertestop bare aaarrgghhd

Latter

Pei-li: Jeg tænker også i forhold til hvis de på en eller anden måde er ens, for mig at se, nu er det så også frivilligt om de vil sætte det på men, jeg ser hvis det på en eller anden måde ikke er nogen altså nogen mængde, som på en eller anden måde er fastsat, så er det bare et rent branding tool for de der virksomheder der ønsker at anvende det, så har det ikke et funktionelt formål overhovedet

Jeppe: De laver om på det hele tiden, så skal vi have det ene så skal vi have det andet så skal vi det tredje – lad folk selv prøve at teste nogle forskellige ting af og spise hvad de har lyst, men selvfølgelig skal vi også blive bedre til og mere bevidst om hvad det er vi spiser men hvis der er en regering der beslutter sig for at nu er det det her der er det rigtige så er der altså farligt hvis det er forkert, for det påvirker usandsynligt mange mennesker, og det har man hørt i alle mulige andre sammenhæng ikk. Så lad dem selv styrer det med hensyn til maden, men informer dem om, ved siden af hvad der er godt og dårligt. DEN DER skal bare, helt tydeligt fortælle, hvad der er i og ikke en skid andet.

Tina: Man skal bare tænke på at, nu er det ikke for sådan at hæve os, men folk er ikke lige så kloge som os, altså, nåh men jeg mener bare at, det kan godt være at

Jeppe: Det bliver jo ikke nemmere for dem at lære det hvis den sandhed de skal forholde sig til ikke er ægte længere – så kan du jo aldrig lære det… altså vi må jo håbe på at der er nogle faste regler så

Tina; Ja-ja…ja, der er nogle mennesker

Jeppe: Rød så skal du stå grøn så skal du gå, vi kan jo ikke sige i virkeligheden kan det jo være den er rød for de andre og så satser, det må du ikke.

Tina: Det er fordi der er nogle mennesker vil jeg i hvert fald tro på der lever blindt efter sådan noget der

Jeppe: Der er sikkert også nogen der er meget mere bevidste om sådan noget der, hvad det indeholder og…

Tina: Ja,ja –ja men jeg kunne godt forstille mig at der er nogen mennesker, og jeg tror der er flere end man tror der tænker, det der, uha, 70 kcal, sådan der, det

Jeppe: Det må du lære i skolen og andre steder det tror jeg ikke producenterne og sådan nogle skal styre, det tror jeg ville være ret uhyggeligt.

Tina: Jeg synes at idéen er god nok med, hvis man putter bare nogle enkelte kcal, proteiner, kulhydrater, fedt, sådan 4, 5 typer foran så man er fri for at gå bagved, altså den sys jeg er meget god, for så vil det igen altid være det samme per 100g og de der 4 5 stykker som altid vil være der?

Moderator: Så forsiden skal også være per 100g og ikke per portion?

Tina: JA, det vil jeg sige det sys jeg

Pei-li: Men uanset hvis du søger efter og kigger efter hvad der er i ting, er det ikke så ligegyldig om det er på forsiden eller på bagsiden

Jeppe: Neeej, for der tror jeg nemlig det handler om, som vi talte om før, hvem der skulle regulere det, så er det jo også en måde at gøre folk opmærksomme på at det er en god ting at overveje, hvis det står på forsiden.

Pei-li: Hvis det er uden betydning for mig, så er det jo bare irriterende for mig at jeg skal forholde mig til alle mulige ting jeg får smidt i hovedet hver gang jeg står i supermarkedet

Jeppe: Nåh jo, men tror du så ikke også at du går hen over det lige som alt muligt andet, jeg tænker bare på at hvis man endelig har lyst til at gøre folk bevidste om hvad de indtager og om det er en god eller dårlig ting så skal de der tal da nærmest bare stå med stort og blinke

Moderator: Lad os tage udgangspunkt i det mærke der ligger der, GDA-mærket, hvad er den vigtigste information som et sådan forside mærke skal kommunikere til forbrugeren?

Jacob: Hvad jeg synes for eksempel

Moderator: Ja

Jacob: Jeg synes det er ret fint med det der kcal per 100g det kan jeg forholde mig til, hvis det står på sodavand så bliver jeg mindre fed af at drikke den sodavand end den sodavand. Kcal er ret håndgribelig, det der med at der et 30% mindre fedt i saltskruger så er der bare skruet op for sukkeren, der er jo alle de der fix faxerier, kalorier det er sådan ret let at forholde sig til i den

sammenhæng i hvert fald. Igen hvis jeg er inde i en sund periode, så sys jeg Kcal per 100g den kan jeg forholde mig til

Mikkel: Jeg er meget, jeg er ret konservativ omkring det der tror jeg og jeg mindes at man i mange år i hvert fald har opgjort det i kulhydrat, fedt og protein, øhh, så det lidt sådan nogle tal der giver mening for mig, hvor meget er kulhydrat øhh hvor meget er fedt – og så ja, så dem kunne jeg egentlig godt tænke mig

Moderator: Hvordan skal nærringsstofferne præsenteres for jer?

Tina: Altså jeg synes sådan set at den måde det står på sedlen der, det er en fin præsentation, jeg vil gerne have fedt protein kulhydrater og fedt, altså det var egentlig de 4 jeg mener er vigtigst for mig, øhh øhh, men altså på den der måde synes jeg det er fint nok. Igen så ville jeg så ikke lige kigge på %

Moderator: Er der nogen af jer der vil bruge procenterne?

Jacob: Nej

Jeppe: næh

Jacob: Jeg synes det er langt ude

Moderator: Hvordan vil i ændre GDA mærket for at mærket kan møde jeres forventninger til nærings mærkning?

Tina: For det første vil jeg ha' øhh ha' øhh hvad hedder det, at det er EN standard hele vejen igennem og at der stod hvor meget det daglige indtag er. Altså der skulle stå 2000 kalorier, det synes jeg er ret vigtigt.

Jeppe: Man skulle også fjerne de der % satser, så man ved hvilke tal man skal forholde sig til, for det der kunne man godt forstille sig kunne forvirrer nogle mennesker, blandt andet mig selv ikke, altså hvis der er flere forskellige tal, jeg skal ikke være i tvivl om når man sige så meget fedt er der i, så skal det være DET tal der kobler sig på fedt og ikke en % sats neden under af en beregning jeg ikke kan gennemskue. Dér skal man jo have en eller anden baggrundsviden for at man kunne forstå og tolke det ikke, det skal være skåret helt ud i pap

Mikkel: Jeg vil sige at jeg synes heller ikke de der %- satser kan komme til at gøre noget godt for mig, fordi at jeg netop forholder tallene til hvad der ellers er i produktet, men ellers ser produktet som en enhed som sig selv. Hvor meget en del af den her yankee bar jeg spiser nu er fedt og så ser jeg det kun i forhold til at jeg spiser den her yankee bar som en enhed, for hvis jeg skulle gå og ligge sammen i løbet af dagen hvad jeg har spist og hvor mange % dele af den kost der daglige energi tilførsel der skulle komme fra fedt protein og kulhydrat så ville jeg være, det ville være, et alt for kompliceret regnestykke. Så jeg ser det egentlig kun, produktet, sådan lidt isoleret set. Så derfor tror jeg aldrig at den der % sats ville kunne komme til at give mig noget information jeg kan bruge

Tina: Jeg tror også øhh der er mange øhh altså netop det der med at sige den gennemsnitlige portion, skal jeg indtage om dagen, men jeg tror ikke at der er særlig mange kvinder der ligger på 2000 kalorier øhh jeg tror altså, det, det ,det variere alt alt for meget til at man kan bruge procenterne til noget som helst.

Moderator: I nævner at de samme nærringsstoffer bør fremgå af forskellige produkter, men ville man ikke kunne forstille sig at enkelte produkter, som sodavand, ville fremstå sundere end de er, da sodavand i så fald vil indeholde 0% fedt 0% mættet fedt og 0% salt?

Jacob: Altså hvis man er, øhh netop hvis man er øhh ikke særlig velinformeret, der er netop mange folk som ikke altså sådan, er lidt mere sådan slum ikke, og siger det ser sq godt du der er ikke fedt i, så drikker vi sq den sodavand- der er jo nok en del mennesker som ikke fatter noget, så jo, men

Jeppe: Igen, det ville jo også være underligt hvis de lavede den om for det, altså, det skal være en fælles standard hele tiden, og så kan det godt være at der ikke er en skid i sodavand, men så må vi forklare folk at det skal de ikke drikke, og det er en dårlig idé, det er ikke mærkets opgave at passe på de groft sagt dumme mennesker

Moderator: Hvad er mærkets opgave?

Jeppe: Det er at informere os alle sammen om hvad det indeholder, hurtigt og kontant, så vi kan se på det og sige, der er godt nok meget protein i den der, den nupper jeg sq, og ikke meget mere

Tina: Altså jeg ser det om at man skal have de overordnet grupper øhh, hvis der står nul i alle tre så er det jo et sundt produkt, så er det jo vand.

Moderator: Hvad er den optimale portionsstørrelse at bruge til beregningen?

Mikkel: Jeg synes at det vigtigste er at man kan sammenligne det, så derfor synes jeg at man skal prøve at sætte en standard som man skal ændre så lidt som muligt, så længe 100g stadig giver mening øhh og 100g er en meningsfuld størrelse så synes jeg at man skal bruge 100g

Jacob: 100g

Mikkel: Indtil vi får mad i pille form, indtil da er 100g et godt mål

Tina: Men jeg synes også at det ville være smart hvis det på en sodavand viste hvad der var i hele sodavanden

Jeppe: Ja men det kunne man jo så groft sagt sige det her er per 100g bum det er den samme og så kan du gange op, men det ville sikkert afsløre en helt masse de ikke kunne li' ikke

Mikkel: Til ting der ikke skal spises på en gang, øhh, der synes jeg at 100g standarden er bedre fordi det er en fast størrelse at forholde sig til. Uanset, øh om folk spiser 50g eller 300g småkager i gennemsnit så synes jeg stadig at 100g er smartest. Man kunne sikkert lave studier der viser at det vil være ok at spise 20g småkager, men det bliver for uoverskueligt for mange mennesker, inklusiv mig, derfor tror jeg jo mere standardiseret øhm vi kan gøre det lovgivningsmæssigt, jo mindre

virkerum har virksomheden til selv at smykke deres produkter på en måde der får dem til at se mere sunde ud.

Moderator: Skal den faste standard på 100g som flere af jer nævner, bør den være ens over forskellige produktkategorier eller skal den skifte f.eks mellem morgenmads produkter og småkager?

Mikkel: EN

Tina: JA

Jacob: Ja en standard

Mikkel: Og så er der sikkert nogle steder hvor den virker absurd men det må vi finde os i, det tror jeg stadig er et trade off jeg gerne øhh vil ofrer, for at have en standard jeg kan bruge til at se hvad jeg stopper i kæften ud fra

Tina: Jeg synes da at nogen gange kan man da godt står og… skal man købe chips eller skal man købe chokolade, så er det der, hvis de hører ind under samme kategori at de vil eller vil de ikke, og hvad med øl og sodavand. Hvis man vil sammenligne en frugtsalat med en pose vingummebamser, det kan jo godt være at man vil se øhh jamen hvor meget hvor - meget synder jeg hvis jeg tager en pose vingummibamser i stedet for noget frugtsalat. Så derfor synes jeg det er bedst med en standard, på 100g som vi er så vandt til.

Moderator: Hvordan mener i at man med fordel kan ændre i designet af GDA mærkningen, så i ville opleve mindre vildledning?

Jeppe: Væk med procenterne

Pei-li: Jeg tror altså bare at så lang tid det er et frivilligt tiltag og at det er virksomhederne selv der på en eller anden måde står for den og vælger forskellige kriterier ud, for mig at se der har de øøh så er der en eller anden konflikt, hvor man kan sætte spørgsmålstegn ved den uanset hvad. Altså hvis det var noget udefra, regeringen eller et lovkrav der sagde at man skulle have den og der var nogle forskellige kategorier, så havde man lidt mere tillid til den.

Moderator: Bør reference personen på GDA skifte alt efter produktet, bør det for eksempel være udregnet med et barn som reference person, når produktet henvender sig til og hovedsageligt bliver forbrugt af børn f.eks Kinder æg?

Jacob: Jeg synes bare allerede der at der er for uoverskueligt, det med procenterne er allerede alt for uoverskueligt øhh

Tina: Også fordi der vel også er børn der spiser voksen mad

Jeppe: Og voksne der spiser børnemad

Latter

Jeppe: Ved at bruge en voksen kvinde, så håber man vel at forældre kan regne ud at børnene skal have det mindre

Jacob: Eller mere fordi de skal vokse

Jeppe: Forbrugeren skal tage den sidste beslutning men det der skal være så gennemsigtig som overhoved muligt, straight on

Tina: Jeg tænker lidt, jeg håber ikke at folk de tænker at folk skal have 100g sukker om dagen

Pei-li: Vi må ikke negligere folks sunde fornuft, folk ved jo godt hvad der er sundt for dem og hvor meget vi må spise. Vi ved godt at hvis vi æder en hel plade chokolade så har vi måske indtaget lidt for meget, men altså

Tina: Men jeg har det så igen, som jeg sagde før, folk er ikke lige så kloge som os, nu har jeg en veninde der arbejder i dagligvarehandlen, hvor at hun sammenligner meget sig selv med sådan det gør folk da ikke, hvor hendes chef blev nød til at sige til hende, ved du hvad, folk er ikke lige som dig. Altså. Vi snakker også om folk som, nu er det ikke for at generalisere, men vi snakker også om folk som der bor i Jylland og folk som har børn og nej men altså det er øhh alle folk er ikke ligesom unge mennesker der bor i København

Pei-li: Men er det ikke også en del af undervisningen man fik i skolen med madpyramiden og altså

Tina: Men hvis man tager en kvinde på 50 år, hendes kostpyramide som hun blev undervist i er meget anderleders end den der bliver undervist i i skolen i dag. Altså den har jo også ændret sig.

Pei-li: Men jeg tvivler bare på at der er mange mennesker i Danmark som ville synes at en, tro at en sodavand er en sund vand.

Tina: Light sodavand? Det kan man sku sagtens, det tror jeg sku

Jeppe: Men det er det igen, den virker på mig

Mikkel: Også på mig

Tina: Jeg tror bare man skal, man skal, man skal ikke gå ud fra at folk har sund fornuft, det tror jeg simpelthen ikke på. Jeg kunne godt forstille mig at nogen ville sige, uha, der er kun 12% af mit sukkerindtag, så må jeg spise meget mere, så må jeg spise et kilo, det tror jeg altså godt. Jeg ville ikke selv gøre det men…

Jeppe: Det er ligesom det med portions størrelserne, det bliver pludselig utroværdigt, 30g, der ville jeg begynde at stille spørgsmålstegn til hvorfor det, jeg tror jeg ville overveje, netop hvis der stod et eller andet skævt tal, der er et eller andet forkert ved det her

Tina: Ja så skal man næsten have lommeregneren frem

Moderator: Eller være dygtig til hovedregning

Tina: Ja præcis

Jacob: Jeg synes bare de skal droppe de der portioner

Moderator: Som det sidste spørgsmål, vil jeg gerne vide om i mener at denne portion, som svare til Kelloggs portionsstørrelse er vejledende eller vildledende?

Mikkel: Vildledende

Jacob: JA

Tina: Ja

Jeppe: JA

Pei-li: ja

Tina: Men det ville sikkert passe meget godt til børn, men så gælder den med procenterne jo ikke.

Annex 2

The point of purchase of all the products is Netto - Nordre Frihavnsgde 70, 2100 København Ø

Product: Kellogg's Coco Pops – Homepage:
http://www.kelloggs.dk/corp/Products/Products/Coco%20Pops.aspx

Product: Kinder Milk-Slice – Homepage:
http://www.ferrero.dk/produkter/kinder/kindermilkslice/fc-474/

Product: Kinder Surprise – Homepage: http://www.ferrero.dk/produkter/kinder/kindersurprise/fc-464/

Product: Kinder Pingui – Homepage: http://www.ferrero.dk/produkter/kinder/kinderpingui/fc-475/

Product: Smarties – Homepage: http://www.smarties.co.uk/home/