



Front of Pack Nutritional Labelling in Northern Ireland

Research with food manufacturers

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Contents

1. Executive summary.....	1
2. Background and objectives.....	3
Background.....	3
Project objectives.....	4
3. Method.....	5
Recruitment of participants.....	5
Data collection.....	6
Data analysis.....	6
Research limitations.....	6
4. Main findings.....	7
Final sample frame.....	7
Manufacturers attitudes towards and understanding of FOPNL.....	7
Drivers to introducing FOPNL.....	9
Challenges to introducing FOPNL.....	11
Experiences of manufacturers who have implemented FOPNL.....	14
Likelihood of introducing FOPNL in the future.....	15
Likelihood to implement FOPNL by business type.....	16
Reformulation.....	17
Sources of advice and support.....	20
5. Discussion.....	22
6. Conclusion.....	25
7. References	26
8. Appendices.....	28
Appendix 1. Recruitment screening questionnaire.....	28
Appendix 2. Discussion guide.....	33

1. Executive summary

Consumers are becoming more health conscious and nutrition is becoming an increasingly important determinant of food choice (IGD 2020). Front of Pack Nutritional Labelling (FOPNL) is recommended by the World Health Organisation (WHO) as a strategy to improve dietary intake, allowing consumers to make healthier choices and motivating food manufacturers to undertake reformulation to produce healthier food (WHO 2014).

The aim of this research was to gain a better understanding of how and why decisions about FOPNL are made by Northern Ireland (NI) food and drink manufacturers.

Community Research and 2CV were commissioned on behalf of the FSA in NI to conduct 40 qualitative telephone interviews with different types of NI food and drink manufacturers who produce food and/or drink for sale in NI.

Overall food and drink manufacturers understood what is meant by FOPNL and that the purpose of FOPNL is to provide consumers with 'at a glance' information on the nutritional content of a product. However, there were mixed views among food and drink manufacturers on consumer demand for this information and the role FOPNL plays in changing food purchasing behaviour.

Food and drink manufacturers who had implemented FOPNL generally found the process to be straight forward and felt positive about this labelling scheme. Amongst those who had implemented FOPNL, the primary reasons for doing so were to;

- Simplify nutritional information for consumers.
- Meet the requirements of retailers and consumers.
- Highlight a product's health qualities.
- Give the product a professional image.
- Future-proof the product in case FOPNL becomes a mandatory requirement.

The main challenges cited by food and drink manufacturers for not implementing FOPNL included;

- A lack of space on packaging.
- FOPNL not fitting with the food product's look and feel.
- The cost of the additional nutritional analysis and label redesign.
- The lack of technical expertise needed to calculate the nutritional value of food and drink products.

Perceived lack of consumer demand for FOPNL and a reluctance to highlight a product's unhealthy elements were also common reasons cited for not implementing FOPNL.

To overcome some of the aforementioned challenges, some food and drink manufacturers sought trusted nutritional analysis expertise from the NI Regional Colleges. They also highlighted the important financial support provided by Invest NI Innovation Vouchers to develop new products or reformulate existing products.

Food and drink manufacturers more likely to implement FOPNL included larger manufacturers with substantial in-house technical teams, businesses supplying larger retailers and those supplying retailers' own brands. Smaller manufacturers, those who had not been in business for long (i.e. had been established within the last five years) and those supplying smaller/independent retailers were less likely to implement FOPNL.

Food and drink manufacturers who would like to implement FOPNL in the future provided similar reasons for wishing to do so as those who already display FOPNL. These reasons included highlighting the healthiness of products to their customers, portraying a more professional image and/or future-proofing their business in case FOPNL becomes a mandatory requirement.

FOPNL encouraged the food and drink manufacturers in this research to undertake reformulation. Many food and drink manufacturers had previously reformulated products or did so on an ongoing basis to continue improving the healthiness of products, and by extension their FOPNL.

Ingredient suppliers play an important role in supporting food and drink manufacturers to undertake reformulation. They work with manufacturers to identify healthier alternative ingredients to reduce levels of fat, sugars and/or salt.

The cost of reformulation and the difficulty of maintaining taste were identified as key challenges to reformulation for many food and drink manufacturers.

Food and drink manufacturers, particularly smaller businesses and those who had not implemented FOPNL would welcome more support, either financially or in the form of clearer guidance and advice to introduce FOPNL and/or to undertake reformulation.

2. Background and objectives

Background

Nutritional labelling on food packaging is known to improve consumer's ability to assess the healthiness of food and encourage healthier food choices (Cecchini and Warin 2016; Dana et al. 2019). In 2016, nutrition information became mandatory on the labelling of prepacked food and drink products (EUFIC 2011). This labelling is commonly referred to as 'back of pack' (Buttriss 2018). However, consumers understanding of back of pack nutrition labelling has generally been found to be poor (Jones and Richardson 2007; Ni Mhurchu and Gorton 2007; Campos et al. 2011).

Voluntary front of pack nutritional labelling (FOPNL) was developed as an alternative source of 'easy to understand' nutrient information for consumers. In 2006, the Food Standards Agency (FSA) led the development of the voluntary UK front of pack nutrition label known as the 'multiple traffic light' (MTL) label (Figure 1). This label uses a colour coded system to provide simplified 'at a glance' information to help consumers determine if the prepacked food they are considering purchasing is high (red), medium (amber) or low (green) in fat, saturated fat, sugars and salt, in addition to providing energy information.

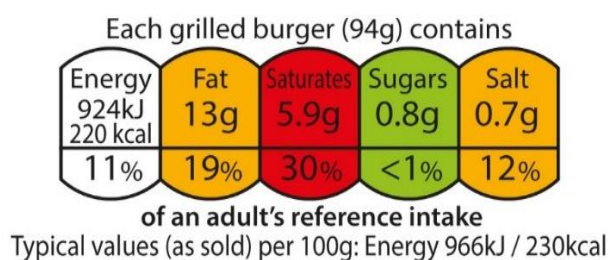


Figure 1. Multiple Traffic Light Label

In 2013, the current MTL label was recommended by the UK Health Ministers following consultation with retailers, manufacturers, charities and consumer associations and extensive research which demonstrated labels with colour coding, percentage reference intakes and information based on per portion were preferred by UK consumers. This label was also found to be the most effective at facilitating understanding of nutrition information and supporting uptake of healthier choices (Malam et al. 2009). The MTL label meets the UK Health Ministers' recommendation on the use of colour coding. However, food businesses who choose to provide FOPNL can present the label with or without the addition of colour coding.

The MTL label has been a success. Research continues to demonstrate this label helps consumers to make informed healthier food choices (Hawley et al. 2012; Ducrot et al. 2015; Cecchini and Warin 2016) and a significant number of businesses, including all major UK retailers display the MTL on either all, or a selection of their own brand pre-packed products. This label is also popular with consumers. In NI, 95% of consumers report recognising the label and 64% use it when making food purchasing decisions (FSA 2020).

Consumers are becoming more health conscious and nutrition is becoming an increasingly important determinant of food choice (IGD 2020). Over half (56%) of the NI population actively seek out healthier options when shopping for food (FSA 2020). Due to increasing consumer demand for information on the healthiness of food and drink (IGD 2020) and increasing use of this information among consumers (FSA 2020), the FSA sought to gain a better understanding of how and why decisions about FOPNL are made by Northern Ireland (NI) food and drink manufacturers.

Project objectives

The objectives of this research were to explore:

- The reasons as to why food and drink manufacturers do and do not display FOPNL.
- Perceptions food and drink manufacturers have on consumer demand for FOPNL.
- The challenges food and drink manufacturers encounter when introducing FOPNL.
- The support required by food and drink manufacturers to implement FOPNL.
- The likelihood of introducing FOPNL amongst food and drink manufacturers who do not currently do so.
- The impact of FOPNL on food and drink reformulation activity.
- Drivers and challenges to undertaking reformulation.

3. Method

Recruitment of participants

NI food and drink manufacturers (herein referred to as food manufacturers) were recruited to participate in this study if they manufactured food and/or drink products for sale in NI and consented to take part. To meet the objectives of the study, quotas were set to ensure a range of business types were included. Sampling was undertaken using three key variables: business size, business location and the number of retail outlets a food manufacturer supplied. These target quotas are shown in Table 1.

Table 1. Sample quotas

Criteria	Target Interviews
Business size	
Fewer than 10 employees	c. 25-30
More than 10 employees	c. 10-15
Location	
Belfast and immediate area	At least 5
Fermanagh / Tyrone	At least 5
Derry / Londonderry / Antrim	At least 5
Armagh / Down	At least 5
No of outlets supplied	
All to supply more than 5 outlets (Majority to be over 10)	
TOTAL	40

c: circa

The screening questionnaire used to determine eligibility to participate in the study can be found in Appendix 1. In addition to the quotas described above, the screening questionnaire collected data on the type of food and/or drink (herein referred to as food) produced by potential participants. This screening question was included to ensure the study sample contained food manufacturers who produce a wide range of product types including ambient, fresh, chilled, frozen, dairy, confectionary, baked goods and soft drinks. Quotas on the number of businesses that had implemented FOPNL on some or all of their products were not imposed, as there is currently no available information on the number of NI food manufacturers that have done so.

To recruit participants to take part in this study, the FSA in NI disseminated an online invite that explained the purpose of the study and contained a link food manufacturers could use to express their interest in taking part. Food manufacturers who expressed an interest in taking part were contacted by Community Research and 2CV to determine eligibility to participate. Potential participants were also recruited using online searches.

Data collection

In-depth semi-structured telephone interviews were used to gain an understanding of participants' perceptions of FOPNL and the motivations for choosing to display or not display FOPNL on food and/or drink products. Forty interviews were completed with food manufacturers between November 2019 and January 2020. The semi-structured interview guide can be found in Appendix 2.

Data analysis

All interviews were transcribed in full and analysed by framework analysis to identify key themes. Upon completion of fieldwork, the full team of researchers met to enable collaborative analysis and interpretation of the themes.

Research limitations

A qualitative approach was chosen in this research study as this method of data collection provides the depth of insight required to achieve the aim of this study. It was also felt, that given the relatively small size of the target audience, it would be very unlikely that a large enough sample for quantitative research could be achieved¹. However, it is important to note qualitative research is not intended to be statistically reliable and as such does not permit conclusions to be drawn about the generalisability of the findings. Although the sample size used in this study can provide a comprehensive understanding of NI food manufacturers attitudes and behaviours towards FOPNL, the findings from this study are not representative of the viewpoints of all food manufactures in NI. Furthermore, as no data is currently available on the number of food manufacturers who have implemented FOPNL in NI, it was not possible to ensure the sample was reflective of this sector in NI. Finally, as with any research study, it is important to note that participants who agreed to take part (particularly those who actively volunteered to do so, by responding to the online invite) may be different in some way to those who chose not to contribute.

¹ Previous work for the FSA demonstrated there are approximately 450 NI based businesses involved in food production / manufacturing. Of these, 180 of these have fewer than 5 employees (and therefore may have been less likely to meet the criteria of selling to 10 outlets or more).

4. Main findings

Final sample frame

The final research sample broadly reflected the quotas put in place. Recruitment of businesses employing fewer than 10 employees proved challenging. As a result, this quota was relaxed to aid recruitment resulting in 50% (n=20) of the sample employing fewer, and more than 10 employees, respectively. Fifty percent of the sample had not implemented FOPNL, whereas, the remaining 50% of participants had implemented it on all or some of the food and drink products they manufacture. The majority of the sample (n=30) supplied food and /or drink products to more than 15 outlets (Table 2).

Table 2. Final research sample

Criteria	Completed interviews
Business size	
Fewer than 10 employees	20
More than 10 employees	20
FOPNL	
No	20
Yes on some products	11
Yes on all products	9
No of outlets supplying	
6-10	7
11-15	3
Over 15	30
TOTAL	40

Manufacturers' attitudes towards and understanding of FOPNL

Overall, food manufacturers understood what was meant by FOPNL. However, it was evident a small number of food manufacturers did not fully understand what is meant by FOPNL. This type of labelling was confused with 'Back of Pack' labelling or it was assumed this type of labelling referred to any kind of labelling on the front of a product. For example, food manufacturers would describe attributes such as 'gluten free' or 'low salt' on the front of the packaging as FOPNL.

Overall food manufacturers also understood the purpose of FOPNL was to provide consumers with 'at-a-glance' information to help determine how healthy or unhealthy a product is. They acknowledged consumers may not look at the detail on the back of a product and that FOPNL provided a simplified version of nutritional information that was harder to ignore.

"To translate the traditional complicated nutritional table on the back into a user-friendly format that people don't have to look for. You're not looking on the back of the pack...it's front of pack for a reason. It's, whether you like it or not, you're seeing it."

Although there was overall agreement the purpose of FOPNL was to provide 'at-a-glance' nutritional information, there was less consensus amongst food manufacturers as to whether or not it achieved this purpose. Where some food manufacturers acknowledged FOPNL did make a difference to consumer food purchasing behaviour and that consumers were actively seeking out this information to identify healthier options, others believe consumer's food purchasing decisions were influenced by other factors.

"My clients are saying that they're looking for the traffic lights on the front of packaging to make healthier choices."

"I think somebody who's going out doing their weekly shop, they're probably more influenced by the pack price and will it fill their family."

While food manufacturers believed FOPNL was helpful at simplifying nutritional information for consumers, a small minority believed FOPNL, particularly traffic light labelling, could be overly simplistic and misleading as a result. These food manufacturers thought consumers would make decisions based purely on colour coding without necessarily taking into account other information, such as portion size.

Perceptions of consumer demand for FOPNL also differed across food manufacturers. Where some food manufacturers believed there was limited appetite amongst consumers for FOPNL, others believed it was increasingly expected of food

manufacturers to provide this information. Some food manufacturers believed consumer demand for FOPNL depended on both the product and on the consumers themselves. For example, consumers might want FOPNL for a food item where the nutritional content wasn't immediately obvious or if choosing between products.

"If you're in the salad, healthy food category there's absolutely a demand... because the kind of people who are looking for that absolutely want to know that. So, it depends on the category. If you're selling cakes, people know it's bad for you before you even lift the thing up."

Some food manufacturers believed there should be more consistency around FOPNL, for example, that it should always be colour coded. They felt that the monochrome design allowed manufacturers to avoid highlighting unhealthy nutritional information and that all FOPNL should be presented in the same format. A few manufacturers believed FOPNL should be made mandatory to ensure a consistent labelling approach is used by all food manufacturers.

"I would like them on legally... if it's high in salt you should be highlighting it, not making it all one colour... It's like hiding behind a loophole."

"So, every company... all choose to use different things in their own different style. I think, if it becomes implemented, it needs to be standard right the way across the board."

Drivers to implementing FOPNL

Food manufacturers who had implemented FOPNL felt positive about this labelling scheme and cited a wide array of reasons for placing FOPNL on their food products.

Food manufacturers provided FOPNL as they wanted to make it easier for consumers to understand the nutritional content of their products and they believed there was consumer demand for it. This belief was based on consumer feedback and the food manufacturers own use of FOPNL when food shopping.

"Often the back of pack information can be complicated, not everybody reads it and it doesn't make a whole big pile of sense to a lot of people. But the front of pack information is designed to be a wee bit more refined, percentages etcetera that are more meaningful to people."

"I think [consumer demand] is pretty high. Me, as a consumer myself when I'm out doing my shopping, I sort of look for it a lot ... We might speak to friends or family... but we don't really do any research."

Food manufacturers also believed FOPNL was a valuable tool to highlight the health qualities of the products they sell, especially if their food products were healthier than their competitors. These manufacturers were targeting their products at more health-conscious consumers and believed FOPNL helped them to sell the health benefits of their products.

FOPNL was also a driver for reformulation efforts. Food manufacturers who already used FOPNL were continually striving to improve the nutritional profile of their products.

"For us it's been a very positive thing, the front of pack, the labelling, because we try to create ground-breaking new healthy products... So, if you show this nutrition, for us it's been a positive thing."

"We formulate with health in mind, with traffic light label colours in mind."

Food manufacturers also displayed FOPNL on their products because their clients including UK retailers, supported it. Retailers provided food manufacturers with guidance on how FOPNL should be presented on products manufactured on their behalf. This was particularly the case when manufacturing retailers' own brand labels.

Manufacturers also believed retailers value this information. Amongst those who had not been required to introduce FOPNL on food products, there was a sense that retailers expect this information to be provided. Food manufacturers who were hoping to supply products to the bigger retail chains had implemented it, as they felt it made their products look more professional and legitimate.

Other manufacturers felt FOPNL would become standard practice and that introducing it might give them a competitive advantage over competitors and/or was simply a sensible pre-emptive business decision. Whilst a competitor introducing FOPNL may not in itself influence manufacturers to do the same, it added to the sense this would become a normal practice encouraging them to give it greater consideration.

"I'm fairly interested in what my competitors are doing and in particular what their products look like on shelf because the consumer decision is going to be whether to lift their product or lift my product, so I'm very conscious of what their product looks like."

Challenges to introducing FOPNL

Within the sample there were some food manufacturers who had chosen not to introduce FOPNL, whilst for others not introducing the labels was more of an omission than a considered decision. The latter group tended to be smaller in size and had not implemented FOPNL due to competing priorities. It was rare food manufacturers would cite a single reason for not introducing FOPNL. For most the challenges were multiple and overlapping.

The latter group were not opposed to FOPNL. These food manufacturers tended to be smaller and had not implemented this type of labelling as they felt there was no requirement to do so. It wasn't a legal requirement, nor were they aware of any pressing demand for it from their retail customers or end consumers. As such, it was not a priority for their business when compared to other demands.

"I think until maybe there was an issue we wouldn't probably change, just because it's such a big undertaking. Unless it did become a mandatory requirement."

A key barrier to implementing FOPNL was a lack of space on the label. Some manufacturers reported having to prioritise branding and other essential information on the label leaving little room for FOPNL. This led some manufacturers to abandon efforts to apply FOPNL.

"There is a limit to what we can get on it. And it's a wraparound label, so we are really tight for information."

Similarly, others believed FOPNL would take away from a clean, sleek product label design and as such, would not fit in with their branding.

"The problem is you have a very small space in which to put a lot of information. If you put a lot of information on the front of a bottle, it's quite off-putting in a way...people like a clean look on a label."

For others, reluctance to introduce FOPNL was due to reservations about how it might impact the look and feel of their product. They felt that FOPNL did not fit the image they were seeking to portray. For example, manufacturers who wanted their products to look artisan or home-made and felt that adding FOPNL would detract from this. Manufacturers felt their retail clients would prefer for them not to use FOPNL for this reason.

"We're artisan producers ... we've spent a lot of money on design. So just to put on the traffic light system would... take away from the look of our product."

For smaller manufacturers the cost of both the nutritional analysis and the label change (in terms of having to have the label redesigned and printed) prohibited the display of front of pack nutrition information.

"We'd have to change our whole label... There's a massive charge every time you have to change the style of your label."

"The software system we have at the minute it only allows us to put in the back of pack information... you needed an additional software or you need to go down the route of pre-printed packs."

Another barrier, particularly for smaller businesses who often have limited in-house resources, was the lack of technical expertise required to calculate the information on FOPNL. This process was viewed as complicated and time-consuming and not something they had the time to prioritise. Food manufacturers were also concerned

they might produce incorrect front of pack nutrition labels and would be penalised as a result. This was viewed as even more problematic amongst those whose products were not standardised.

"Nutritional testing would be a big deal. Getting the results to interpret... the knowledge – there's that feeling that you're not quite interpreting the guidelines right."

"It would be working out how many calories are in each item. I think that would be a bit of a job, it would be very laborious. So that would concern me, it would take a lot of time to actually break things down. Then especially because a lot of the stuff I do is all handmade, you have inconsistencies, everything's not uniform in shape and size."

Food manufacturers also believed FOPNL wasn't something that would be of benefit to them and might detract from their product. The reluctance to introduce FOPNL for some was related to an unwillingness to highlight the less healthy nature of their products.

"Perhaps if we were trying to sell some benefit like this is healthy, this is high in protein, low in sugar, but we're the opposite so we really wouldn't want to advertise it."

Other food manufacturers had made the decision to emphasise or highlight health claims such as 'suitable for vegans' or 'a good source of protein' rather than FOPNL. They felt this would be more appropriate for their products and/or customer base.

Some food manufacturers also believed there was no consumer demand for FOPNL and providing this label would make no difference to purchasing behaviour. This perception tended to be based on personal views rather than market research.

"I don't think it makes a whole lot of difference. I know personally, for me, I've never looked or given any thought to the nutritional information on the front of the package."

Food manufacturers thought that if a product was a 'treat' item, then consumers did not need or expect the unhealthy nature of it to be highlighted on the packaging.

Similarly, manufacturers of foods they perceived to be 'simple', i.e. containing minimal ingredients such as butter believed there was no need to provide FOPNL.

"Most of the public know that [XXX] is high in sugar, it's a treat, it's sweet, it's not going to be good for you. So, I don't think there is any need for front of pack nutritional labelling on our [XXX] or [XXX] in general."

Experiences of manufacturers who have implemented FOPNL

Those who have implemented FOPNL have generally found it straightforward, particularly larger manufacturers who have in-house resources to aid the process. Some retailers provide pre-printed labels or templates for their own-label products which further simplifies the process of placing FOPNL on food products. To reduce the costs associated with implementing FOPNL, food manufacturers who had decided to display this type of label tended to do this when launching a new product, or when making changes to food packaging or brand design. The main challenges manufacturers had encountered in placing FOPNL on their own brands mirrored the challenges to introducing it. These included lack of space on the product, concerns around technical accuracy and operational challenges such as having the correct quantities of labels in stock.

Most manufacturers in the sample had implemented colour coded FOPNL, but some had implemented monochrome FOPNL to avoid highlighting the nutrients in their food products they knew would be coded red. The additional cost of colour coded labelling was also cited as a reason for monochrome FOPNL.

While FOPNL coded in green was preferable, generally manufacturers were happy as long as they achieved amber codes.

"So as to not have too many reds, we just avoid the colour coding. Now having said that we are bringing out a healthy [XXX] range in January, and those are coming up for the most parts greens and oranges. We then made the decision to actually declare that."

Likelihood of introducing FOPNL in the future

When asked how likely they would be to introduce it in the future, food manufacturers' responses reflected their overall attitudes to FOPNL. Attitudes spanned from those who would only do so if it became a legal requirement, to those who expected or hoped to do so before too long. Those who thought they were likely to introduce FOPNL would wait for a trigger, such as a brand redesign or recipe change before doing so.

"If we updated the recipe and we were going to be changing the label design, then we might add it but, because we haven't needed to change the labels, we haven't put it on."

Some manufacturers currently had a 'wait and see' attitude and wanted to gauge which way the market was heading before committing to FOPNL, but accepted that if their customers were demanding it, they would probably introduce it.

"If customers started to require it, obviously it would be something we would have to do."

The drivers for those who were planning on introducing FOPNL in the future were broadly in line with those who had already done so. Food manufacturers would like to highlight the healthiness of a product to their customers, portray a more professional image and/or future-proof their business. For some newer and growing businesses, appearing more professional as a manufacturer was viewed as a step towards working with the larger retailers.

"To make you look as if you're competing with the big guys and you belong with the big guys. You want to aspire to be at their level, to be taken seriously... you want to look like you... you've got the same information, or as much information or more information than is required."

In terms of the future-proofing driver, this was both in terms of legislation i.e. being prepared if FOPNL were to become mandatory, but also in relation to competitors i.e. ensuring that they were keeping up with or getting ahead of their competitors.

"I imagine there will be, laws will come in at some stage which means that everything will have to have some kind of basic information on it."

"If it was a standard in the industry, in the market, if we were on the shelf beside another one or another two and both of them do, we would definitely consider it because you wouldn't want to make your product less attractive."

Some of the smaller and less established businesses in the sample viewed the introduction of FOPNL as the next obvious step in light of consumer's growing interest in the nutritional profile of food and drink products they are considering purchasing.

"We have enough questions about it from general consumers – we do a lot of events and sampling, we're more and more aware of people turning the pack round and reading the detail on the nutritional. So, it is something I would certainly look at."

Likelihood to implement FOPNL by business type

Given the qualitative nature of this research and the difficulty in recruiting a sample that adequately represents NI food manufacturers, it is not possible to definitively state the types of businesses that have or have not implemented FOPNL. However, some indicative patterns in the findings are outlined below.

Businesses more likely to implement FOPNL included larger manufacturers with substantial in-house technical teams, businesses supplying larger retailers and those who were supplying retailers' own brands. Such businesses tended to have the necessary resources to support the introduction of FOPNL and had been providing this information for several years. It was the business' default position to do so.

Smaller manufacturers, those who had not been in business for long (i.e. had been established within the last five years) and those supplying smaller/independent retailers, were less likely to use FOPNL. While some choose not to implement FOPNL due to the challenges outlined above, smaller businesses were also more likely to lack the necessary resources that are required to introduce it. As a result, many smaller food manufacturers did not currently prioritise implementing FOPNL.

Although the product type itself was often a factor in decision making, the 'healthiness' of the product was not always a primary driver. For example, some food products where the front of pack nutrition label would be predominantly colour coded green did not display FOPNL due to a range of the reasons discussed above, whereas less healthier products higher in calories, fat, saturated fat, sugars and salt did.

Within the sample there were several food manufacturers who used FOPNL on some, but not all, of their products. Often this was because these food manufacturers supplied retailers with own label products and were requested to supply FOPNL on these products. The same food manufacturers chose not to introduce FOPNL on their own brands, due to the reasons previously discussed. Others used it only where they felt it would be advantageous i.e. on healthier products, but not on others. Some retailers only used FOPNL where they had space, for example, on larger packs, but not on smaller variants or single portions.

Reformulation

Many food manufacturers (approximately two thirds of this sample) had reformulated their food or did so on an ongoing basis. Reformulation was often an ongoing process, particularly amongst larger manufacturers. These manufacturers reported continually experimenting with their products to determine if they could make their products healthier, cheaper to produce, or better tasting.

FOPNL was certainly a driver for many reformulation efforts. For example, manufacturers who already used FOPNL were continually striving to reduce or avoid red traffic lights.

"We would be striving for greater numbers [i.e. nutritional scores] on all of our products and we do actively seek to reduce the ambers. So we are definitely trying to change the information on the front of pack as well, for what is better for consumers."

Others in the sample were in the process of reformulating with the primary aim of improving the nutritional profile of their products in order to introduce FOPNL.

"We made a conscious decision that we were going to try to make the products more healthful and so we contacted [Local College] and that process is still ongoing, we're still redeveloping recipes but in the not too distant future, certainly next year, I would like to have the traffic light system on the FoP."

Rather than changing their existing products, some manufacturers had developed or were developing new healthier versions of products (for example low or no added sugar). They intended to see how well these products sold and potentially phase out the original version, if the new product proved a success.

"Our team is actually working on a low sugar version of some of our products, they've yet to launch, we haven't quite nailed it yet. It's something that we're looking at because, again, it's going to be more apparent on the market, low sugar versions of things."

Reformulation was also something that was asked of some manufacturers by retailers, who were aiming to improve the nutrition information presented on the front of pack nutritional label.

"There has been a lot of work done on salt reduction and the retailers have been keen."

Ingredient suppliers also played a role in driving reformulation both directly and indirectly. For example, some worked with food manufacturers to help them identify healthier alternatives for their products that would reduce levels of salt, sugars or fat. Sometimes ingredients were discontinued by suppliers, which forced food manufacturers to try something new.

Food manufacturers identified a number of overlapping challenges to reformulation, some of which mirrored the challenges to implementing FOPNL.

A key challenge for many food manufacturers was trying to balance the desire to make a product healthier without compromising on taste.

"The taste, because you're obviously using different ingredients to replace the sugar but without affecting the taste and the quality of the product."

"The struggle is then creating a product that is still of a high enough quality, and people believe is still value for money, whilst still having the green. So, there's a big challenge for the food technologists here, and the chefs, to find that balance."

The cost of reformulation was often a challenge, particularly for smaller manufacturers both in terms of the cost of trialling and testing new recipes and the cost of alternative ingredients. Food manufacturers reported healthier versions of ingredients often cost more.

"It causes increased expense to us. So, we have to go down the route of nutritional testing. All our retailers require each product to be sampled three times. Three times cooked, three times uncooked. To give the average of the results. So, it is a huge expense. Especially when you're looking at a range of maybe eight or ten products."

"The stuff that we were producing with lower levels of salt and sugar we've had to add more ingredients into to make it taste nicer... Which has incurred a cost and has increased the cost of the final product."

For some food manufacturers, it wasn't an option to change ingredients as the alternatives weren't always there. They were also often reliant on their suppliers to provide ingredients which can further complicate matters or cause delays to reformulation efforts.

"If there aren't a good, wide variety of healthy options of the ingredients out there, then we're more limited, and then you have to pay more to buy them because they're not the industry standard item; you have to go a bit further afield to source. So, sourcing can be an issue at the beginning."

For some food manufacturers changes in ingredients meant that the shelf life of their product decreased, which also proved problematic.

"Without the nitrates your shelf life isn't as long."

"That's the one that the retailers don't want to compromise on: shelf life."

Again, for smaller food manufacturers who often did not have large in-house resources to conduct reformulation, finding the time to try different recipes and complete nutritional analysis was often not a priority and therefore did not happen.

"We only have really one New Product Development Manager on site and she does all of this. So, if she's busy maybe making new products or doing samples, then it's fitting that into her time as well."

For some, these challenges proved too difficult to overcome and despite having gone quite far down the reformulation route, they resigned themselves to keeping their existing products.

"We just reconciled ourselves to the fact well, it's a sugary product and that's the nature of the beast so we're not going to try and change it."

Other manufacturers did not want to participate in reformulation. They could not see the need while they had customers willing to buy their products as they were, and they did not want to run the risk of making an inferior product in the process.

"I just find that the products that I make have been developed over years and they're tried and tested and popular and there's no reason [to reformulate]."

Sources of advice and support

Larger food manufacturers usually had technical teams in house, and as such required very little in the way of support or information. By contrast, smaller manufacturers often lacked both the technical expertise and the financial resources to introduce FOPNL and/or reformulate their products.

For many the costs associated with introducing FOPNL and undertaking reformulation were the key challenges

"The labelling is important to a lot of people, but small businesses like ourselves it's an expense to introduce that."

A number of businesses in the sample had used Innovation Vouchers from Invest NI² to help them develop new products or reformulate existing products and this financial help was seen as important.

"A very straightforward support package like the Innovation Voucher that was specific to that process. For a small manufacturer, I think the financial side of it plays a disproportionate part of your decision and I think a very straightforward package that aims specifically at that, and the outcome is you have the information, you have the design and you're ready to go. I think that would have the biggest sole influence."

In addition to financial support, food manufacturers also looked for help with the technical requirements. Regional Colleges were a trusted source of help for many when it came to specific nutritional testing. For more general information or guidance about market trends, businesses tended to rely on their trade associations, or for the very smallest manufacturers on word of mouth at events or through their networks.

"We have support facilities as well at a food college. They have a number of different facilities from small scale ups to development kitchens, everything. So they have a number of resources both with their lecturers as well that we can tap into."

The FSA was viewed as a trusted source of advice and guidance on FOPNL. However, some food manufacturers believed the existing FOPNL guidance could be made clearer. For instance, food manufacturers found it difficult to relate to the example provided in the guidance when dealing with a very different type of product or if portion sizes were smaller.

"It's just being given clear guidance and clear information. Sometimes you have to go looking to get information from a couple of different sources."

² <https://www.investni.com/>

Given the complexity of completing nutritional analysis, several food manufacturers suggested an online calculator would help to calculate the nutritional value of products.

"Some sort of online step-by-step with a calculator where you can put in the volumes of each of the different ingredients, because I do have to rely on going back to the consultants that I work with."

Training courses or workshops were also suggested as a source of support for manufacturers, particularly newly started businesses.

"If there was some sort of course for me, as an Operations Manager..."

"I think it's something that's very important for anybody starting up a business, they need to be aware of what does and what doesn't need to go on the label."

Food manufacturers also identified a lack of official reassurance as a concern when it came to FOPNL. They were aware they can source nutrition information about their food products from laboratories, but food manufacturers were not always confident it was correct and would welcome an official stamp of approval. Some food manufacturers reported seeking advice from local Environmental Health Officers, but occasionally found varying levels of support.

"I can't find any information online about what's right and what's wrong, and even amongst my EHOs I get conflicting information."

5. Discussion

FOPNL offers food manufacturers the opportunity to deliver nutritional information in a simplified format for their customers, highlight their product's health qualities, meet consumer and retailer demand for this information and provide their products with a professional image. Food manufacturers who have not implemented FOPNL can be categorised in to two groups; 1) those who do not have the required resources to carry out FOPNL and 2) those who believe FOPNL does not fit within their overall product image or are reluctant to highlight the unhealthy nutritional profile of their products. Although FOPNL is not a current priority for the former

group, it is encouraging these food manufacturers may be receptive to introducing FOPNL in the future.

NI food manufacturers understand the purpose of FOPNL is to provide consumers with simplified nutritional information. However, there were mixed views on the use of this information among consumers. Whilst some food manufacturers acknowledged FOPNL did make a difference to consumer food purchasing behaviour and that consumers were actively seeking out this information to identify healthier options, others thought there was a lack of consumer interest in FOPNL and that consumer's food purchasing decisions are unlikely to be influenced by this information. The MTL label is utilised by almost two thirds (64%) of NI consumers when making food purchasing decisions (FSA 2020). Food manufacturers in this study, particularly smaller food manufacturers relied more on their own personal experience or verbal feedback from their networks to determine consumer trends. These findings suggest an opportunity exists to improve food manufacturers awareness of the importance of utilising credible market intelligence and consumer insight data from trusted sources such as the FSA, Invest NI and the Institute of Grocery Distribution when deciding whether or not to implement FOPNL. This may be particularly important in encouraging food manufacturers who have not yet introduced FOPNL but indicated they would do so if they believed there was customer demand for this information.

Food and drink manufacturers more likely to implement FOPNL included larger manufacturers with in-house technical teams, businesses supplying larger retailers and those supplying retailers' own brands. Smaller manufacturers, those who had been established within the last five years and those supplying smaller/independent retailers were less likely to use FOPNL. These businesses often faced multiple overlapping challenges preventing them from implementing FOPNL including the cost of completing the additional nutritional analysis and food/drink label redesign and the lack of technical expertise needed to calculate the nutritional value of their products. Small food manufacturers valued the support provided by NI Regional Colleges in providing nutritional analysis expertise as well as the financial support provided by Invest NI Innovation Vouchers which can be used for reformulation and new product development. These findings suggest there is an opportunity to disseminate information more widely on the opportunities available to NI food businesses who wish to access specialist support and funding to implement FOPNL.

Food manufacturers who had not yet implemented FOPNL were also concerned about the lack of space on food/drink labels for FOPNL, the potential impact of FOPNL on the look and feel of their products, the perceived lack of consumer demand for this information and the potential for FOPNL to highlight the unhealthy

attributes of their products. However, consumer research on FOPNL completed by the Institute of Grocery Development (IGD) reported shoppers can be sceptical about food products when MTL labels are not present and 83% of shoppers agree you do not have to avoid products with red colour coded traffic lights, but eating fewer can help achieve a healthier diet (IGD 2017). Improving NI food manufacturers awareness of the value shoppers place on FOPNL when making food purchasing decisions will be important in motivating food manufacturers to provide this information to consumers. Food manufactures also highlighted they would value FOPNL workshops and additional support to interpret the existing FOPNL guidance.

The results of this study clearly demonstrate improving the nutritional profile of food products is at the forefront of food manufacturing activity amongst the sample included in this study. Approximately two thirds of the manufacturers who took part in this study had previously participated in reformulation or did so on an ongoing basis. It is also notable FOPNL motivates food manufactures to engage with reformulation. Food manufacturers who display FOPNL were continually striving to improve the nutritional profile of their products and those who had not yet implemented FOPNL were engaging with reformulation in order to introduce this labelling at a later date. Although it is not possible to generalise these results to the NI food industry, the findings are very positive, as reformulation of foods to reduce nutrients detrimental to health is recognised as an important strategy in reducing the dietary intake of such nutrients (WHO 2014). FSA research suggests NI consumers are receptive to purchasing foods reduced in fat, sugar and/or salt. Almost 60% of consumers indicated they would be more likely to purchase food reduced in these nutrients in comparison to regular versions (FSA 2020). Independent research commissioned by the FSA in 2018 to explore NI consumer's perceptions of reformulation of the seven food categories included in the UK Government's sugar reduction programme (breakfast cereal, morning goods, ice cream, yoghurt, cake, pudding and biscuits) (PHE 2019) reported that 73% of NI consumers would purchase reformulated or resized products from these food categories (2CV and Community Research 2018). Importantly, findings from the same study found consumers want clear and noticeable information to signal when changes have been made to products and that consumer support was highest for information shown on front of pack. Sharing consumer research findings with the NI food industry will be important to encourage further uptake of FOPNL, particularly as some food manufacturers in this study believed that if a product was a 'treat' item consumers did not need or expect the unhealthy nature of it to be highlighted on the packaging. These findings suggest there is an opportunity to raise awareness and understanding amongst NI food manufacturers of the benefits associated with improving the nutritional profile of their food products and introducing FOPNL.

This study also emphasises the challenges food manufacturers, particularly the smaller manufacturers, face in undertaking reformulation. The cost of reformulation and the difficulty of maintaining taste were key challenges identified by many food and drink manufacturers. Supporting food manufacturers with these challenges will be important in not only encouraging engagement with reformulation, but also in encouraging further uptake of FOPNL.

6. Conclusion

The findings of this research demonstrate food manufacturers who display FOPNL associate this type of labelling with a wide range of benefits. It is also clear FOPNL motivates food manufacturers to engage with reformulation. However, some food manufacturers continue to face challenges in implementing FOPNL and others don't view FOPNL as a priority. To encourage further uptake of FOPNL and participation in reformulation it will be necessary to improve NI food manufacturers understanding of the factors that influence NI consumers food purchasing behaviours and to provide more support both technically and financially.

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8. Appendices

Appendix 1: Recruitment screening questionnaire

RECRUITMENT SCREENER – Food businesses

PROJECT: FSA FOPNL

PLEASE READ THIS PRIVACY NOTICE TO ALL BEFORE STARTING SCREENING

- Community Research and 2CV Research are leading consumer market research agencies. Viewpoint is conducting recruitment for this research on their behalf.
- We would like to collect the following personal data from you:
 - Name, occupation, phone number, address, email address, audio recordings.
- The personal data we collect will be used for market research purposes only.
- Our legal basis for processing your personal data is your voluntary informed consent.
- You may withdraw consent at any time by contacting your recruiter.
- We will never pass your personal information on to other organisations for them to use for their own marketing purposes.
- Your personal data will be processed in the European Economic Area (“EEA”) only.
- Community Research / 2CV maintain appropriate technical, administrative and physical safeguards to protect personal data.
- We will process and store your personal data for up to 5 years from the end of the project for client contractual obligations and quality control.
- Our client (the data controller) is the Food Standards Agency in Northern Ireland.

Sample:

40 x 30-45 minute tele-depths with small business owners/senior decision makers

Recruitment criteria:

All respondents will be:

- Business owners and senior decision makers with responsibility for decision making around food packaging

Criteria	Target
Business size	
Fewer than 10 employees	c. 25-30
More than 10 employees	c.10-15
Location	
Belfast and immediate area	At least 5
Fermanagh / Tyrone	At least 5
Derry / Londonderry / Antrim	At least 5
Armagh/Down	At least 5
TOTAL	40

Community Research / 2CV, on behalf of the Food Standards Agency in Northern Ireland is conducting research with food / drink manufacturers in Northern Ireland into how and why decisions about product packaging labelling are made. The interviews will last around 30-45 minutes and will be conducted at a time convenient to you, with independent researchers. The research will be confidential: The Food Standards Agency NI will not know who takes part in the research and the feedback you give will be completely anonymised.

If you are interested in taking part, I just need to go through some questions with you to confirm your eligibility for the study and to ensure that we have a broad spread of different types of organisations.

Q.1 Does your company manufacture packaged food or drink for sale in Northern Ireland?

Yes
No

All to answer yes. Please confirm that they sell goods in Northern Ireland (not just manufacture them there).

Q.2 Who is the person who has responsibility for making decisions about food or drink packaging in your company?

Me
Me in conjunction with others in the business
Other people in the business

All respondents to be (joint/sole) decision-makers in relation to food packaging. If not their responsibility, please ask to speak to the person whose responsibility it is.

Q.3 Could you please confirm the types of food or drink you manufacture (tick all that apply)?

- | | | |
|------------------|--------------------------|--------------------------------------|
| Fresh foods | <input type="checkbox"/> | |
| Chilled foods | <input type="checkbox"/> | |
| Frozen foods | <input type="checkbox"/> | |
| Ambient foods | <input type="checkbox"/> | |
| Dairy products | <input type="checkbox"/> | |
| Confectionary | <input type="checkbox"/> | |
| Baked foods | <input type="checkbox"/> | |
| Soft drinks | <input type="checkbox"/> | |
| Alcoholic drinks | <input type="checkbox"/> | DO NOT RECRUIT IF ONLY THIS IS CODED |
| Baby food | <input type="checkbox"/> | DO NOT RECRUIT IF ONLY THIS IS CODED |
| Other | <input type="checkbox"/> | Recruit as OTHER |

.....

Do not recruit food businesses that ONLY manufacture baby food or alcoholic drinks

Q.4 Where in Northern Ireland is your business based (headquarters or majority of premises)?

.....

Please aim for a good spread as per target quotas.

Q.5 How many people do you employ in your business?

- | | | |
|------------------|--------------------------|--------------------------|
| 1, myself solely | <input type="checkbox"/> | Individual / Sole Trader |
| 2-9 employees | <input type="checkbox"/> | Micro business |
| 10-49 employees | <input type="checkbox"/> | Small |
| 50-249 employees | <input type="checkbox"/> | Medium |
| 250+ employees | <input type="checkbox"/> | Large |

Please aim for at least 1/3 of total sample to employ 10 or more employees

Q.6 How many outlets do you supply your food / drink products to in Northern Ireland?

- 0-5 DO NOT RECRUIT
6-10
11-15
Over 15

Please aim for all / most of the total sample supply 10 or more outlets

Q.7 Front of Pack labelling is simplified nutritional information provided on the front of food / drink products e.g. traffic light colouring, guideline daily amounts etc. It is shown in addition to the standardised nutritional composition table found on the back of packs. Do you currently put Front of Pack labelling on your products?

- Yes on all our products
Yes on some of our products
No

Please record

RESPONDENT TO AGREE:

I agree that these answers and information are truthful and correct.

Respondent Agrees:

- I agree to take part in all aspects of this research project as described above.
- I give permission for the interview to be audio recorded and I give permission for the audio files to be used only by the research company (Community Research) and the FSA NI. The audio files are to be used solely for the purposes of research.

Community Research are members of the Market Research Society and therefore are obliged to maintain anonymity of their respondents.

Day/Date:

Time:

RECRUITER TO SIGN:

I certify that I have carried out this interview according to your instructions, INCLUDING READING WORD FOR WORD ALL THE IMPORTANT INFORMATION IN THE BOXES AND ENSURING I HAVE GAINED THE RESPONDENTS INFORMED CONSENT TO TAKE PART.

I have conducted the interview within the MRS Code of Conduct.

Signed: _____

Appendix 2: Discussion guide

Objectives

- To understand industry views of FOPNL.
- To explore rationale for displaying / not displaying FOPNL.
- To explore views on reformulation.

Introduction and warm up

5 mins

-
- Moderator to introduce self
 - Explain moderator role: impartial, independent, run tasks and keep to time
 - Explain recording and confidentiality
 - Session length
 - Nature of research:
 - We will be discussing front of pack nutritional labelling (i.e. simplified at a glance information on the key nutritional aspects of food)
 - Need to be as open and honest as possible – no right or wrong answers
 - Respondent introductions: Name, what business they work in, what their role is, how long they've done it for.

Context / business background

5-10 mins

-
- How big is the company you work for? How many employees?
 - What are the product ranges manufactured by your company?
 - And what outlets do you supply?
 - How many?
 - Which products?
 - What other manufacturers supply similar products to you? How do you compare in terms of size etc. to your competitors? [get a sense of size / market share]
 - Which products do / don't have FOPNL? Why? [Just a brief overview – will explore in more detail later on]

- And what sort of information is displayed? Prompt around use of numbers vs words, colour coding etc.

FoP labelling decision making

5-10 mins

- Overall, how are decisions made about FOPNL?
 - How / when / where are decisions made?
 - Who inputs into the decision making? And who has the ultimate say?
 - What are the main drivers that influence these decisions?
 - To what extent do the retailers you supply influence your decision making? Have they requested for / against FOPNL of your products?
 - What do your competitors / those manufacturing similar products do? To what extent does them introducing FOPNL (or not) impact on your decision making?
- How / have decisions about FOPNL changed over time?
 - And how likely is it that things will change in the future? Why? What factors might lead to change?

Perceived consumer demand / feedback

5 mins

- What do you see as the main purpose of FOPNL?
- To what extent do you feel there is / isn't a demand from consumers for FOPNL?
 - Why? What evidence, if any, do you have to support this?
- To what extent do you feel that FOPNL has an impact on consumer behaviour / purchasing? What sort of impact has it had?
 - Why? What evidence, if any, do you have to support this?

Attitudes / rationale of those who have introduced FoP labelling

10-15 mins

- When was the decision made to introduce FOPNL?
- What drove it?
- What, if any, were the challenges of introducing it? Probe around financial, concern about consumer rejection of products displaying FOPNL etc.
 - How were these overcome?
 - What support was needed / might have helped?

- What impact, if any, did it have on the business? Positive / negative. Probe around encouraging reformulation of products, impact on consumer behaviour etc.
- What, if any, components of FOPNL were you were most concerned about displaying e.g. calories / saturated fat etc.
- [If only done for certain products in the range] Why was this? How likely is it that you will expand FOPNL across the range?
- [If not colour coded] Why is this? Might you introduce this in the future? Why / why not?

Attitudes / rationale of those who have NOT introduced FoP labelling 5 mins

- What has prevented you from displaying FOPNL?
- Are there any specific components of FOPNL were you are more concerned about displaying e.g. calories / saturated fat etc.
- Have you ever done so in the past? What made you stop?
- Might you do so in the future? Why / why not?
- What support would you need?
- Who, if anyone, would you trust to provide information about the impact / benefits of FoP labelling on business outcomes? Prompt around: FSA, Which?, Institute of Grocery Distribution, Food and Drink Federation

Product reformulation 5-10 mins

- Has any reformulation of products taken place (either in terms of reducing levels of salt, sugar or fat in products, or a reduction in portion size)?
- **If yes:**
 - Which ones? Why? How were these decisions made?
 - Are some products more / less likely to be reformulated?
 - And are some nutrients more / less likely to be decreased / increased?
 - Where / when have products been reduced in portion size (rather than ingredients altered)? Why? Which products?
 - To what extent has this been driven by FOPNL?
 - What are the challenges / barriers to reformulation?

- What support might be needed / could help in the future?
- Might further reformulation / reformulation of other products be considered?
 - What would encourage this?
- How do you feel about the voluntary nature of product reformulation?
- **If no:**
 - Why not?
 - What are the challenges / barriers to reformulation?
 - How likely would you be to consider it in the future? Why / why not?
 - What support might be needed / could help in the future?
- Who, if anyone, would you trust to provide information about the impact / benefits of reformulation on business outcomes? Prompt around: FSA, Which?, Institute of Grocery Distribution, Food and Drink Federation

Summing up and close**5 mins**

- If there was one thing that could be done to make it easier for manufacturers like yours to introduce FOPNL, what would it be?
- And if there was one thing that could be done to make it easier for manufacturers like yours to reformulate products, what would it be?
- Do you have any other thoughts or comments on the topics we've discussed?

[Interviewer to gauge appropriateness of asking participant if they would be willing to share any examples of food product packaging that illustrate some of the discussion points]

- Thank and close
- Confirm payment details