

External reference group – 5 A Day logo

ERG 5 A Day advice paper: summary of the discussions for potentially extending the current government 5 A Day logo and portion indicator to include composite foods. This paper details the advice from the 5 A Day External Reference Group and does not necessarily reflect the views of Public Health England or the policy of health departments.

Including composite foods in the government 5 A Day logo and portion indicator scheme – possible criteria

1. This paper reflects the outcome of discussions during the external reference group 5 A Day meetings held on 12 November 2014, 16 December 2014 and 20 February 2015.
2. The group also received background papers and correspondence in relation to this topic both which were discussed. This paper should be read alongside a wider range of comments received by correspondence [papers [ERG/5ADAY/15/13](#) and [ERG/5ADAY/15/13A](#)].
3. Strong views have been voiced both for and against extending the government 5 A Day logo to include composite foods. Most members considered extending the scheme would be of benefit as long as there were certain principles and nutrient cut-offs applied to determine eligibility of products (particularly as manufacturers and retailers are already using their own 5 A Day logos, and extending the scheme would provide an opportunity to increase use of the government 5 A Day logo). Some voluntary organisations, and some working in the health sector, saw benefit in not proceeding with this approach to 'protect the integrity of the logo' and to 'avoid unintended consequences' (eg encouraging people to consume more 'processed foods'). Others highlighted that the benefits of fruit and vegetables are not solely based on their lack of processing before consumption and that consumers often 'process' fruit and vegetables during preparation in the home (eg pureeing, or as an ingredient within a recipe with added fat, sugar or salt).
4. Some members and others they represented voiced concern at setting nutrient criteria at 'not high' (based on reference intakes) and supported setting nutrient criteria at 'low' (based on reference intakes) for some or all nutrients discussed. Most members considered that restricting nutrient criteria to 'low' would not be viable and would mean very few composite foods containing at least one portion of fruit and/or vegetables per serving would be eligible to use the government 5 A Day logo.
5. Should it be decided to extend the government 5 A Day logo to include composite foods, the general principles and options for nutrient-based criteria considered by the external reference group for 5 A Day are provided in tables 1-3 below. For each general principle/nutrient criteria considered, the outcome of discussions is provided.

Table 1. Draft general principles to be met for a composite food to use government 5 A Day logo and portion indicator scheme should the scheme be extended to include composite foods

General principles		Outcome of discussions
Definition of composite foods	A food or drink comprised of two or more ingredients, ¹ at least one of which is not a fruit and/or vegetable ²	Consensus
Minimum portion fruit and/or vegetables per serving size	Provide at least one portion of fruit and/or vegetables per serving which can be made up of a variety of fruit and vegetables. For example, a composite food containing 30g grilled aubergine, 20g tomato, 15g courgettes and 15g onions (80g vegetables in total per 400g serving size) would contain at least one portion of fruit and/or vegetables	Consensus reached to provide at least one portion of fruit and/or vegetables per serving Lack of consensus to allow a portion to be made up of a variety of fruit and/or vegetables. Views from some represented at the meeting that if a composite product were to use the logo it should contain at least 80g of one variety to claim it provides one of your 5 A Day. Other members considered that there would be risks associated with this approach (ie for a significant number of composite foods this would be impractical and potentially misleading and could limit the variety of fruit and vegetables consumed from composite products). Others noted the potential advantage of a mixture of fruit and vegetables to provide a portion (ie it might provide a broader range of nutrients and bioactives)
Incremental portion size	Must provide at least one portion of fruit and/or vegetables per serving; thereafter one portion increments	Consensus There was a minority opinion that half portions may be valuable

¹ This does not include additives or water. Some additives are legally allowed to be added in very small amounts as processing aids and are essential for maintaining the quality of the product. Such products can qualify for the logo. Some examples include approved colours; a small amount of oil added to dried fruit to prevent sticking; vitamin C added to restore that lost during processing; preservative added to improve shelf life; and a small amount of fibre added to thicken smoothies etc but not in the quantity to make a nutrition content claim on the pack.

² Potatoes do not count towards 5 A Day. 100% fruit and/or vegetable juices, pulps and purees are included

<p>Maximum portion fruit and/or vegetables per serving size</p>	<p>No upper limit to the number of portions a product can declare, providing there is the appropriate amount and variety of fruit and/or vegetables and the serving size of the product is realistic</p> <p>100% fruit juice, dried fruit, beans and pulses and concentrated strength purees³ can only contribute a maximum of one portion each per serving even if a food or drink contains more than one portion of fruit and/or vegetables from these. For fruit juice this equates to a maximum of 150ml. For dried fruit this equates to a maximum of 30g. For concentrated strength purees this equates to 80g fresh weight equivalent. Smoothies to provide a maximum of two portions (see table 2)</p>	<p>Consensus</p>
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³ Concentrated fruit purees is the product obtained from fruit puree* by the removal of a specific proportion of its water content, and in respect of which, if flavour has been restored to it, such flavour has been recovered from the same species of fruit. *Fruit puree means the fermentable but unfermented product obtained by suitable physical processes such as sieving, grinding or milling the edible part of whole or peeled fruit without removing the juice;

Pulp or cells means:

- a) In respect of citrus fruit, the juice sacs obtained from the endocarp, or
- b) In respect of any other fruit, the products obtained from the edible parts of the fruit without removing the juice

<p>Variety of fruit and vegetables</p>	<p>Provide an appropriate variety of fruit and vegetables in a serving of the product if more than one portion is declared</p>	<p>Consensus on need for variety if more than one portion is declared</p> <p>Lack of consensus to allow a portion to be made up of a variety of fruit and/or vegetables. Views from some represented at the meeting that if a composite product were to use the logo it should contain at least 80g of one variety to claim it provides one of your 5 A Day. Other members considered that there would be risks associated with this approach (ie for a significant number of composite foods this would be impractical and potentially misleading and could limit the variety of fruit and vegetables consumed from composite products). Others noted the potential advantage of a mixture of fruit and vegetables to provide a portion (ie it might provide a broader range of nutrients and bioactives)</p>
<p>Target audience – adults only</p>	<p>Must not be aimed specifically at children. This includes products marketed specifically at children, but not necessarily all products consumed by children⁴</p>	<p>Lack of consensus</p> <p>Concerns raised from some members and through correspondence that products aimed specifically at children will not be eligible to use the government 5 A Day logo. Some felt this was unhelpful and potentially confusing if the products contain at least one portion of fruit and/or vegetables (ie 80g) and would limit exposure of children and parents to the 5 A Day logo</p> <p>Others noted that many companies will continue to promote 5 A Day to children and there is a risk that this would undermine use of the government 5 A Day logo should it be extended to composite foods</p> <p>Some members, and comments received through correspondence, supported exclusion of composite foods marketed specifically at children</p>

⁴ Products presented specifically as children’s products or to appeal to children by design and labelling should not carry the government 5 A Day messaging or logo

Table 2. Draft principles for calculating the number of portions of fruit and vegetables per serving of a composite food carrying the logo (while not promoting overconsumption of calories, saturated fat, salt or sugars, ie non-milk extrinsic sugars or free sugars) should the scheme be extended to include composite foods

Draft principles for calculating the number of portions of fruit and vegetables per serving			Outcome of discussions
Type of fruit/vegetable	Conditions*	Portion size	
Fresh		80g whole fruit or veg	Consensus
Frozen		80g	Consensus
Dried	Maximum of 1 portion	30g (or 80g fresh weight equivalent)	Consensus
Freeze-dried	Maximum of 1 portion	30g (or 80g fresh weight equivalent based on robust evidence from the manufacturer/supplier)	Consensus
Canned (excluding pulses)		80g	Consensus
Pulses (including canned)	Maximum of 1 portion	80g cooked weight	Consensus
Juices	Maximum of 1 portion	150ml (of 100% fruit or vegetable juice)	Consensus
Smoothies	Maximum 2 portions	At least 80g of whole fruit/vegetable (ie either 80g of one variety or 80g made up of a combination of different varieties) and 150ml of 100% fruit and/or vegetable juice of a different variety (or 150ml made up of a combination of different varieties) OR a minimum of 80g of one variety of whole fruit/vegetable, and/or at least 80g of another variety (or 160g made up of a combination of different varieties) of whole fruit and/or vegetable	<p>Consensus on maximum number of portions</p> <p>Lack of consensus to allow a portion to be made up of a combination of fruit and/or vegetables</p> <p>Some views raised at the meeting and through correspondence that if a composite product were to use the logo it should contain at least 80g</p>

			<p>fruit or 80g vegetable or 150ml juice of one variety (to claim it provides one of your 5 A Day). Other members considered that there would be risks associated with this approach (ie this would be impractical and potentially misleading and could limit the variety of fruit and vegetables consumed from composite products generally). Others noted the potential advantage of a mixture of fruit and vegetables to provide a portion (ie it might provide a broader range of nutrients and bioactives)</p> <p>Others questioned inclusion of smoothies</p>
Concentrated purees	Maximum of 1 portion	80g based on fresh weight equivalent	Consensus

Non-concentrated purees ⁵	Not identified	Not identified	<p>Consensus for inclusion of non-concentrated purees</p> <p>Lack of consensus on total number of portions that could be claimed per serving</p> <p>Noted that this would also be influenced by definition of a non-concentrated puree and whether it was sieved or not</p> <p>Views received through correspondence that there should be no limit on number of portions that could be claimed from vegetable purees (eg in soups)</p>
Extruded fruit and/or vegetable products (eg fruit leathers)	Not identified	Not identified	<p>Lack of consensus on whether they should be included</p> <p>Members noted views from correspondence to exclude these as allowing such products would likely lead to increased sugar consumption and in excess of what would be consumed from eating whole fruit.</p>

⁵ Fruit puree means the fermentable but unfermented product obtained by suitable physical processes such as sieving, grinding or milling the edible part of whole or peeled fruit without removing the juice; Pulp or cells means:

- a) In respect of citrus fruit, the juice sacs obtained from the endocarp, or
- b) In respect of any other fruit, the products obtained from the edible parts of the fruit without removing the juice

			<p>Due to their texture may adhere to teeth and increase risk of dental caries. There would also be implications around sugar intake and energy density/weight gain.</p> <p>Some members agreed that products made solely from compressed dried fruit (ie similar to dried fruit) could be considered separately to other types (such as those made from concentrated fruit juices). All agreed that the latter (with or without added sugars) should not be included</p>
Fruit or vegetable powders, extracts or flavourings	Not included		Consensus

* Excluding starchy vegetables usually eaten as starchy staples such as potatoes, yams, cassava

Table 3. Options for nutrient-based criteria to determine eligibility of composite foods to use the government 5 a day logo and portion indicator scheme should the scheme be extended to include composite foods

Nutrient criteria for discussion⁶		Outcome of discussions
Energy	An energy cut-off should not be set because this is considered to be complicated, difficult to determine and irrelevant if other nutrient cut-offs, which contribute energy, are included	Consensus
Total fat	<p>Nutrient criteria for total fat based on reference intakes:</p> <ul style="list-style-type: none"> • for food – not more than 17.5g per 100g or 21g per serving if serving size is greater than 100g • for drinks – not more than 8.75g per 100ml or 10.5g per serving if serving size is greater than 150ml 	<p>Lack of consensus</p> <p>Some voluntary organisations and some working in the health sector, represented by some of the ERG 5 A Day members, voiced concern and considered that this criteria should be 'low' (based on reference intakes) rather than 'not high'. Views received through correspondence that this was particularly relevant for drinks containing dairy products such as whole milk and cream. Most members were in favour of 'not high' (based on reference intakes)</p> <p>Members accepted that there would be a few products containing beneficial unsaturated fats (eg from oily fish,</p>

⁶ General consensus that criteria calculated using reference intakes would provide the best option in terms of coherence, consistency of approach and understanding:
 Regulation (EU) No 1169/2011 of the European parliament and of the council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004. Available at:
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:304:0018:0063:EN:PDF>

		nuts and avocado) that would not meet the criteria based on 'not high' (or 'low'). However, they acknowledged there are very few examples where such a product contains sufficient fruit and/or vegetables for this likely to be an issue
Saturated fat	<p>Nutrient criteria for saturated fat based on reference intakes:</p> <ul style="list-style-type: none"> • for food: not more than 5.0g per 100g or 6.0g per serving if serving size is greater than 100g • for drinks: not more than 2.5g per 100ml or 3.0g per serving if serving size is greater than 150ml 	<p>Lack of consensus</p> <p>Some voluntary organisations and some working in the health sector, represented by some of the ERG 5 A Day members, voiced concern and considered that this criteria should 'low' (based on reference intakes) rather than 'not high'. Most members were in favour of 'not high' (based on reference intakes)</p>
Total sugars	<p>Nutrient criteria for total sugars based on reference intakes:</p> <ul style="list-style-type: none"> • for food: not more than 22.5g per 100g or 27g per serving if serving size is greater than 100g • for drinks: not more than 11.25g per 100ml or 13.5g per serving if serving size is greater than 150ml <p>However:</p> <ul style="list-style-type: none"> • where ALL sugars within a composite product are from fruit and/or vegetables the nutrient criteria for total sugars is not applicable 	<p>Lack of consensus</p> <p>Some voluntary organisations and some working in the health sector, represented by some of the ERG 5 A Day members, voiced concern and considered that this criteria should be 'low' (based on reference intakes) rather than 'not high' because of potential unintended consequences of weight gain and increased risk of obesity. Most members were in favour of 'not high' (based on reference intakes)</p>

<p>Salt</p>	<p>Nutrient criteria for salt based on reference intakes and 2012/2017 salt targets</p> <ul style="list-style-type: none"> • for food – not more than 1.5g per 100g or 1.8g per serving if serving size is greater than 100g • for drinks – not more than 0.75g per 100ml or 0.9g per serving if serving size is greater than 150ml • meet 2012/2017 salt targets⁷ 	<p>Lack of consensus</p> <p>Some voluntary organisations and some working in the health sector, represented by some of the ERG 5 A Day members, voiced concern and considered that this criteria should be ‘low’ (based on reference intakes) rather than ‘not high’ and meet salt targets (with focus on meeting 2017 rather than 2012 targets). Others supported use of ‘not high’ threshold and salt targets</p> <p>Some members representing industry did not support use of both nutrient criteria and salt targets together but would support use of either nutrient criteria or salt targets instead (in line with current IGD guidance)</p> <p>Members accepted that there would be a few products containing beneficial unsaturated fats (eg from smoked oily fish) that would not meet the criteria based on ‘not high’ (or ‘low’). However, they acknowledged there are very few examples where such a product contains sufficient fruit</p>
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⁷ Public Health Responsibility Deal salt targets for 2017 and 2012 are available at:
<https://responsibilitydeal.dh.gov.uk/responsibility-deal-food-network-new-salt-targets-f9-salt-reduction-2017-pledge-f10-out-of-home-salt-reduction-pledge/>
<https://responsibilitydeal.dh.gov.uk/wp-content/uploads/2012/01/Salt-Targets-for-Responsibility-Deal.pdf>

		and/or vegetables for this likely to be an issue
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6. Members considered the outcome of the NDNS data review (identifying the most commonly consumed fruit and vegetables and the contribution of fruit juice to nutrient intakes) and the outcome of the rapid review on fruit juice and health. Members agreed that it was not possible to dissociate any effects of fruit juice from the original evidence based on which the 5 a day scheme was founded. They also agreed that there was no evidence to suggest fruit juice should be excluded from 5 A Day messaging or use of the 5 A Day logo scheme as long as restrictions around portion size and wider messaging remains to reduce risk to dental health.

Secretariat
External Reference Group – 5 A Day
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