



Summary of comments received in relation to the work of the 5 A Day External Reference Group

A thematic synopsis of comments received in relation to the work of the 5 A Day External Reference Group (ERG) is provided below. A full summary of comments received are available within papers [ERG/5ADAY/15/13](#) and [ERG/5ADAY/15/13A](#). All comments were provided in full to the 5 A Day ERG prior to formulating its advice to PHE.

PHE will take all comments received into consideration when reviewing the advice it has received from the 5 A Day ERG, in order to reach a conclusion with UK health departments on any potential extension of the scheme.

Theme
<p>Overarching comments on the extension of 5 A Day Logo to include composite foods</p> <p>A number of respondents outlined concern at the possibility of extending the existing government 5 A Day Logo to include composite foods. Comments received centred around the potential to undermine public health messages on healthy diets through the promotion of foods that the general public see as poor choices (eg high fat, salt and sugar foods) which can contribute to excess energy intakes. Concern was raised that use of the strapline 'just eat more' with the logo would promote a message that composite foods could be consumed in unlimited quantities. Some noted that further testing would be required to ensure the public are not misled about the healthiness of products high in fat, salt and sugar. Others raised concerns that extending the logo to composite foods may promote reliance on such products as a source of fruit and vegetables and adversely impact consumption of fruit and vegetables in their whole form with no net gain in consumption of fruit and vegetables. It was noted that implementation would need supporting messages to counteract this – particularly as the evidence base underpinning the 5 A Day message almost certainly did not include composite foods, or 'processed' products that have only</p>

been made available more recently. Concerns were also raised about using the logo on composite foods that are seen as healthy alternatives to fresh produce and the health benefits of consuming these being exaggerated.

Some respondents welcomed the possibility of extending the existing 5 A Day logo provided composite products met certain nutrient criteria. It was noted that awareness/uptake of the current government logo is low and that extension to composite foods would enable inclusion of the logo on a range of items and promote recognition above other schemes. It was also noted that this approach may stimulate reformulation of products by manufacturers to contain more fruit and vegetables. The importance of re-emphasising the 'at least five portions' aspect of the 5 A Day message was also raised.

If the government 5 A Day logo is extended, some respondents questioned how this would sit alongside other existing 5 A Day logos. It was considered that any extension to the government 5 A Day logo could lead to confusion with other existing schemes and make it difficult for consumers to distinguish between different schemes and any differences in criteria underpinning them. One view was that manufacturers would manipulate the logo within legislation to support increased sales and this necessitated greater regulation around its use. It was also proposed that industry should be restricted to using the government's logo. Others considered that industry should be encouraged to use the government logo to ensure consistency and increase its recognition. Some health professionals commented that they avoided providing 5 A Day advice based on labelling due to inconsistencies across different schemes.

Criteria to determine eligibility of products to use government logo if extended to composite foods

Minimum amount of fruit and vegetables within a serving size

Some respondents considered a minimum of one portion fruit and vegetables per serving of a composite food should be a requirement to use the 5 A Day logo as they considered anything less than this (ie half a portion) would weaken general 5 A Day messages, need consumer testing and could encourage greater consumption of composite foods in order to achieve a full portion.

Incremental portions

There was a mixed response to incremental increases – with some supporting half portion increments (with a whole portion as a minimum) and others supporting a full portion as an incremental increase. It was noted that half portion increments would need consumer testing.

Variety of fruit and vegetables within a portion

There was support from some respondents for any combination of fruit and vegetables to make up one portion (including purees) whereas others put forward arguments against this approach. These included use of purees negating the benefits of whole fruit and vegetables (ie bulking properties and displacement of high fat, salt and sugar foods) and that the original research underpinning the 5 A Day messages counted whole fruit and vegetables. Others considered there was no difference between a fruit or vegetable processed/pureed by the consumer or by the manufacturer. Some considered that any cumulative benefit associated with consuming small quantities of vegetables within composite foods to make up one portion would be there anyway; regardless of whether these are associated with a 5 A Day logo.

Calculating portions of fruit and vegetables in composite foods

Fruit juice and/or smoothies

Comments and evidence were received both for and against including contribution from fruit juice and/or smoothies in products using the government 5 A Day logo.

Arguments to include contribution from fruit juice include maintaining consistency with general 5 A Day messaging/inclusion in school food standards. Some outlined that juice can be a convenient option as part of a healthy balanced diet particularly as most people aren't meeting the 5 A Day recommendation, fruit juice can be an important source of micronutrients for some and, although high in sugar, fruit juice remains a better choice than sweetened carbonated drinks.

Arguments against inclusion of fruit juice/smoothies include that allowing smoothies (including those made from the whole fruit/vegetable) will not have the same physiological effect as whole fruit and vegetables (ie satiating properties and reduced displacement effect) due to the change in physical structure. Others considered that fruit juice should also be excluded from carrying the 5 A Day logo because it is high in free sugars.

Some comments considered other consequences of excluding fruit juice, smoothies or both. For example, if fruit juice was excluded, should smoothies which contain all the fibre of the original fruit also be excluded? If both fruit juice and smoothies were excluded would passata and tomato puree also need to be excluded?

Comments received also emphasised that, if fruit juice and/or smoothies were included in relation to the 5 A Day logo, there would be a need to limit the number of portions they could contribute. There was some support for

maximum one portion from all fruit juice/smoothies, for one portion from smoothies, and others rejected smoothies counting as a maximum two portions due to sugar content. There was also support to include two portions providing there was a variety of fruit in pulped form (with any sieved product treated in the same way as fruit juice). It was noted that it was easy to consume smoothies and juices in a large volume and often in addition to, rather than replacement for, solid food.

Some considered that, if the contribution from fruit juice were to be included, extra emphasis on messaging around this (ie amount and frequency) would be required and that fruit juices should not be conflated with vegetable juices.

Non-concentrated purees (and 'processed' fruit and vegetables generally ie any food that no longer has the same shape/appearance of fruit or vegetable it was derived from (purees and fruit juice provided as examples)

Some considered that 5 A Day should be obtained predominantly from unprocessed fruit and vegetables and this should be promoted through wider government dietary messaging. Some considered the dietary fibre content of these types of products is much less than constituent whole fruit and that other benefits such as bulking and displacement of high fat, salt and sugar (HFSS) foods are reduced or lost on pureeing. Others noted that there are many health benefits of diets rich in whole fruit and vegetables and much of the long-term research data is from studies obtained before the proliferation of processed fruit and vegetables and that the number of portions of non-concentrated purees that could contribute should be limited (per variety or per serving – with more support for the latter).

Some considered limiting purees and other 'processed' fruit and vegetables generally to one portion in total which would support SACN recommendations to increase fibre and reduce free sugars intake. Others considered that limiting to two would be appropriate. In addition, it was considered there should be no limit on the number of portions provided by vegetable purees including soups.

Particular concern was raised about the need for appropriate wider messaging to support appropriate use of purees. For example, sieving of pulped fruit or vegetables for babies is necessary to avoid choking. It was noted that sugars in such products were classified as free sugars this would be confusing for parents who wish to avoid feeding 'added sugars'. This may have unintended consequences.

'Extruded fruit products/fruit leathers and similar products'

Some felt it would be helpful if consumption or analytical data of such products were available to inform the decision on whether they should be included. Fibre and nutritive value was assumed to be less than whole fruit.

A number of respondents considered such products should be excluded from using the government 5 A Day logo should this be extended to composite foods. Arguments to support their exclusion included that they are proportionally higher in sugar than equal weight of whole fruit, stick to teeth and are primarily promoted as in-between meal snacks, all of which are bad for dental health. Implications regarding sugar intake and weight gain were also raised. Extruded fruit products were cited as an example of a 'potential loophole' of the 5 A Day logo scheme, that is, products that may meet standards for use of the logo but which would not normally be recommended as part of a healthy balanced diet, and there was a view that there was no evidence these products are of benefit to public health.

Another view was that only such products with additional ingredients such as extra sugar or concentrated fruit juices should be excluded (ie that products made of 100% fruit, such as dried compressed fruit, could be included). More generally, views were submitted that these products should not be promoted as equivalent to fresh fruit.

Use of nutrient criteria generally

Strong support for nutrient criteria to be established to determine eligibility of products and to ensure that products using the logo would help consumers to meet dietary goals. There was concern that there would be potential to promote foods also high in fat, sugar and/or salt unless strict criteria applied.

Overall support for use of front of pack guidance to ensure consistency across government in terms of its public health policy. Others considered the logo should not be applied to products which would be deemed unhealthy using the FSA nutrient profiling system.

Which nutrient criteria to use

Opinions divided on which front of pack-based nutrient criteria should be applied to determine eligibility of products to use the 5 A Day logo should this be extended to composite foods.

Some considered that, unless a product was 'low' (green) for all categories (ie fat, saturated fat, salt and total sugars) it should not be eligible whereas others considered this would mean the logo would be included on too small a range of items. There was specific support for 'low' (green) only for selected nutrients (eg

for salt, and for sugar in particular) or certain food types (eg fat content of drinks). For salt, a number of respondents supported the need to meet Responsibility Deal salt targets too, although some did not support this approach.

Others supported the use of 'not high' (ie green or amber) for all categories although the total sugar front of pack criteria was challenged as too high. It was also felt that consideration should be given to classification of free sugars as opposed to total sugars in pulped and pureed products (as free sugars released during processing). It was acknowledged by some that composite products containing a lot of fruit would naturally have a high sugar content and there was some support to exclude the need to meet nutrient criteria for sugar where all sugars are from fruit and vegetables. Some comments specified this exclusion should apply to *whole* fruit and vegetables only.

Mixed views on whether an energy cap was required. Some considered this would add a whole additional layer of complexity and was not necessary as other nutrient criteria would, essentially, act together as an energy cap. Others considered that this would be a more appropriate approach rather than use of front of pack guidance. Another view was that it was unwise to exclude energy from the nutrient criteria in light of the obesity problem.

Target audience for products with 5 A Day logo on pack should the government logo be extended to composite foods

Opinion divided as to whether use of the logo on pack should be for adults only (ie not for use on products aimed specifically at children).

Concern raised that foods aimed at children would be excluded even if they complied with nutrient criteria and provided micronutrients, with suggestion that definitions and equivalent approach for children is required by age.

Some stressed the need to carefully consider marketing and advertising of products to children and sustainability of the logo. It was suggested that careful messaging would be required – as considered difficult to explain why children and parents shouldn't be encouraged to consume 5 A Day through use of the logo and many companies will continue to promote 5 A Day to children in a way that may undermine use of the government logo.

Others considered that the logo should not be used on composite foods aimed specifically at children. Some felt that only when an equivalent children's portion size for fruit and vegetables can be determined should the logo be used in this way, as it was inappropriate to apply an 'adult size' portion of fruit and

vegetables to inform criteria for use of the logo on pack for foods aimed specifically at children. It was considered that there were also considerable energy density and oral health considerations which may be compromised by promotion of processed fruit and vegetable foods to children.

Other comments received:

One view received that, should PHE take an approach that did not use very stringent limits, it would not be fulfilling its role to protect and improve the nation's health. They also noted that vested interests can bias scientific discussions (importance of total fat as a source of calories and saturated and trans fats for example) and questioned the validity of dietary recommendations for saturated fat and front of pack criteria for total sugars and for salt.

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