



## 5 A Day External Reference Group – additional correspondence and comments

Sector	ID No.	Key points for consideration	Other feedback or contributions
Health	18	<p><b>Use of 5 a day logo on composite foods</b></p> <p>The inclusion of composite foods using the 5-a-day logo could lead to confusion with other industry schemes which have differing nutrient criteria.</p> <p>Agreement that it would be good to illustrate how to help achieve the 5-a-day target, however it would be essential to ensure that products that contain the logo would help meet dietary goals.</p> <p>Some concerns expressed that if consumers make up their 5-a-day from packaged foods only that there could be a concern as to the other contents of what else is in processed</p>	<p>The logo is not widely used as a communication tool with clients and consumers in Scotland.</p> <p>This particular logo was not recognised above the other based schemes.</p> <p>The PHE 5-a-day logo is only on a very limited number of products. In order for the logo to be recognised it would have to appear on a larger number of products than the number and type of products it is currently on.</p> <p>If the logo was on a greater number of foods this would increase awareness of the logo and hopefully increase</p>

	<p>foods. There was a preference that 5-a-day should predominantly come from unprocessed fruit and vegetables.</p> <p>There was recognition that people are eating more composite foods, therefore it would be useful to extend the use of the logo.</p> <p>Some views that they would have no issue with increments in half portions however others expressed concern around inclusion of a half a portion of fruit and vegetables could encourage greater consumption in order to achieve a full portion.</p> <p><b>Eligibility criteria for composite foods</b> Overall consensus that it could be useful to use the logo on composite foods but only on products meeting certain nutrient criteria.</p> <p>Consensus that using the scheme on composite foods would be welcomed provided the products had no red front of pack labels.</p> <p>In order for the 5-a-day logo to be recognised it would need to appear on a larger range of items therefore this would have need to include both green or amber front of pack labels. If products that only contain green labelling were to be included the label would be on too small a range of food items.</p> <p>The concept of including an energy cap was also discussed</p>	<p>the amount of fruit and vegetables consumed (it may also encourage reformulation of products to contain more fruit and vegetables).</p> <p>The logo does not portray information regarding the types of foods consumers should eat more of, and therefore it is still difficult for them to know how to achieve the right balance .</p> <p>As there is no consensus for the criteria used in industry schemes in terms of what constitutes a portion of fruit and vegetable, and the types of products they can be displayed on, health professionals generally avoid giving advice based on this type of labelling.</p> <p>Health professionals would need to be educated on a new 5-a-day logo and how it should be used in practice.</p> <p>Concerns raised because the food industry is using their own criteria and this will make it difficult for consumers to discern the different schemes.</p>
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Health	19	<p><b>Fruit Juice</b> – continue to use logo in same way as present with extra emphasis on qualifying statement about amount and frequency. The volume currently consumed by some is the problem so message needs to be clearer about portion size/frequency/meal occasion. Seen as an important source of vitamins and minerals for some groups and although high in extrinsic sugar remains a better choice than sweetened carbonated drinks. Would be very confusing message for the consumer if completely removed – is allowed within school meals standards and offered in school.</p> <p><b>Smoothies</b> – limit to 2 portions and must include a variety of fruit in a pulped form (if sieved to remove fibre treat as fruit juice). Too easy to consume excess volume and often an additive to, rather than replacement for, normal food intake. Evidence is not available for the contribution of fruit in this format to public health/ disease prevention. Consider how fat content of drinks could be limited to ‘green’ criteria to prevent over consumption (don’t have examples but whole milk/cream/fruit puree products in coffee shops may fall into amber criteria).</p>	<p>A consistent 5-a-day logo could be a useful usual sign for consumers. Concerns about unintended consequences if seen to be promoting foods that the general public see as poor choices.</p> <p>Needs to be presented with messages about the additive value of fruit and veg in composites to complement intakes of fresh, frozen, tinned fruit and veg (ie don’t rely on all composite food for a 5 a day).</p>

		<p><b>Soups</b> – not to be grouped with fruit purees/smoothies or drinks – different product and successful way to improve vegetable intakes. Does not need to be limited by number of portions provided info is based on reasonable portion size, includes a variety of vegetables and meets nutritional criteria.</p> <p><b>Fruit leathers/extruded fruit products</b> – would like to see nutritional value of these products if available. Fibre and nutritive value assumed to be less than whole fruit and may increase contact with teeth. General feeling is that these products should not be promoted as a fruit equivalent.</p> <p><b>Portion indicator</b> – keep as a whole portions as a starting point. Possible support for ½ portions from that point – would need to test with consumers.</p> <p><b>Nutrient criteria</b> – support for ‘not red’ for food products. Consider implications of restricting drinks to ‘green’ for fat.</p> <p><b>Children</b> – If a portion size to qualify for a 5 A DAY portion is to remain at 80g (ie the adult level) it is not appropriate to apply this criteria to children’s foods. Only when an equivalent children’s portion can be agreed should the logo be used on foods specifically aimed at children.</p>	
Health	20	<p><b>5 a day logo on composite foods</b>  General support for the use of the logo on composite foods as it was felt that it may encourage manufacturers to increase the fruit and vegetable content of their products</p>	<p>Supportive of the 5 A Day logo; however, awareness of the logo is considered to be low in Northern Ireland and recommended that it would benefit from updating. One respondent suggested that the logo should include</p>

	<p>Recommended that the saturated fat, salt and added sugar content of the various foods should be considered when deciding whether a food should feature the logo. Some examples cited included tinned soups, which are often high in salt compared to homemade, and products which are tinned in tomato-based sauce (eg spaghetti hoops). These products were not considered to be appropriate for use of the logo.</p> <p><b>Front of pack' colour coding</b>  Undecided on whether the front of pack colour coding would be useful and relevant in assessing eligibility of composite foods to use the 5 A Day logo.</p> <p><b>Criteria based on 'low' (all green)</b>  Opinions divided, with some recommending that only all green foods should be eligible for the logo, whilst others recommended that both green and amber should be eligible.</p> <p>Some concern was expressed about potential 'loopholes', ie products that meet the standard for use of the logo, but which would not normally be recommended as part of a healthy balanced diet. One example is extruded fruit products.</p> <p><b>Criteria based on 'low' and 'medium' (all green and amber, no red)</b>  Opinions divided, with some recommending that only all green foods should be eligible for the logo, while others recommended that both green and amber should be eligible.</p>	<p>images of what 5 a day looks like; while another commented about the confusion among the public resulting from recent media recommending 7-a-day.</p> <p>Highlighted the need to control the use of the logo to prevent incorrect use/abuse. Some noted that they lacked confidence that it was used appropriately and others highlighted their concerns about the potential to promote foods that are also high in fat, sugar and/or salt unless there is strict regulation with the use of colour-coding and portion caps for these nutrients.</p> <p>Also noted that some food manufacturers state on labels 'one of your 5 a day per 200ml' and commented that this can be confusing and misleading to the public, as 150ml is actually equivalent to one portion.</p>
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		<p><b>Energy cap for products carrying the 5-a-day logo</b></p> <p>Some views that this would be a more appropriate approach than the use of colour coding, while others felt that using the colour coding would negate the need for the use of an energy cap.</p>	
Voluntary sector	21	<p>Consensus position submitted supported by the many health benefits of diets rich in whole fruit and vegetables, and these key points have been summarised from evidence compiled by Williams (2015) [available at: <a href="http://theconversation.com/food-fight-is-business-trying-to-game-the-five-a-day-system-36524">http://theconversation.com/food-fight-is-business-trying-to-game-the-five-a-day-system-36524</a>].</p> <p>Fruits and vegetables provide micronutrient, phytochemical and dietary fibre.</p> <p>Fruits and vegetables have simple positive effects like filling people up and displacing other less nutritious foods from the diet.</p> <p>No individual components have been identified that could be guaranteed to have the same effect whether eaten as a puree, concentrate or whole plant.</p> <p>Much of the long-term research data linking greater fruit and vegetable intake with better health is from studies obtained before the proliferation of processed fruit and vegetables.</p> <p><b>Children</b></p> <p>There is agreement that the 5 a Day logo should not be included on composite foods marketed at children.</p>	<p>All food companies should be encouraged to use the official PHE logo in order to ensure consistency and increase recognition among consumers. There are concerns that consumers are not be able to distinguish between different logos, and any differences in criteria which may underpin these.</p> <p>The use of the 5 A Day logo on composite foods has the potential to mislead and result in people eating multiple portions of processed foods to meet their 5 A Day. Any extension of the logo's use to composite foods will need to be carefully monitored for 1) compliance by the food industry and 2) the impacts on consumers and consumption. We are however, concerned that if the scheme is revised, this will not be accompanied by a systematic evaluation programme to assess these impacts.</p> <p>The message 'try to get most of your 5 a day from non-processed fruit and vegetables' should accompany messaging from PHE in their health promotion campaigns, such as Change4life.</p>

	<p><b>Purees</b> We recommend that portions from purees are limited to a maximum of one portion regardless of how much is provided in a composite product, in line with fruit juices and smoothies. The dietary fibre content of purees is much lower than its constituent whole fruit, and other benefits such as bulking and displacement of HFSS foods are reduced.</p> <p><b>Salt criteria</b> Only products that meet the green Front of Pack (FOP) nutrition labelling salt thresholds AND 2017 salt reduction targets should be eligible for the 5 A Day logo, in order to ensure consistency across government in terms of its public health policy.</p> <p><b>Sugar criteria</b> The logo should be restricted to products coded green on the FOP nutrition labelling criteria.</p> <p>We support the exclusion of extruded products such as fruit leathers, due to dental health and energy density concerns. There is also no evidence that these products are beneficial to public health.</p> <p><b>Fat criteria</b> Should be restricted to products colour coded green on the FOP nutrition labelling criteria.</p>	
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**Adding up fruit and veg components from multiple ingredients to count as a portion**

We do not support this approach because as stated in the introduction, some of the additional benefits of whole vegetables and fruit e.g. bulking and displacement of other foods may be lost. If there are any cumulative benefits of consuming small quantities of vegetable ingredients, people will receive these anyway, regardless of whether or not they are associated with a 5 a day logo.

**Summary position of 5 A Day on composite foods**

The combined fruit and vegetable market in the UK was worth over £15 billion in 2013<sup>1</sup>. This huge market which combines fresh, frozen, canned and dried fruit and vegetables is already eligible to carry the 5 a day logo under the existing rules of the government scheme.

The 5 A Day logo and ‘just eat more’ strapline has promoted the message over the years that these natural, whole foods can be eaten in unlimited quantities. Such a message would not be appropriate for composite foods such as main meals and snacks which are high in fat, salt and/or sugar, and would only serve to confuse consumers.

If the rules are to be relaxed and extended to composite foods then only composite food products meeting the criteria for a green colour-code in the government’s FOP nutrition labelling criteria for salt, fat and sugar should be eligible for

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<sup>1</sup> Mintel. Fruit and vegetables UK 2013. <http://store.mintel.com/fruit-and-vegetables-uk-october-2013>



		the 5 A Day logo, in order to support consistency across government policy on nutrition.	
Voluntary sector	22	<p><b>Composite foods</b></p> <p>We fully support and encourage the exclusion of processed foods and drinks marketed to infants and children from carrying a 5 A Day logo. It is essential that the consumption of whole fruits and vegetables is encouraged in infants and young children, and these vulnerable consumers should be protected from health claims. There are considerable energy density and oral health considerations related to infants and children which may be compromised by the promotion of processed fruit and vegetable foods.</p> <p>Whilst an agreed and workable definition for children may not be currently agreed, foods and drinks promoted to children in infancy and the early years should be easily identifiable due to the nature of these foods, the brands under which they are sold and the nature of these in terms of portion size, age related advice on packaging and the places where these products are sold.</p> <p>Processed products aimed at all children should be excluded from bearing the 5 A Day logo. The WHO guidelines on marketing of food and non-alcoholic beverages to children suggest that restrictions can be made on the marketing of foods and non-alcoholic beverages to nurseries, schools, school grounds and pre-school centres, playgrounds, family and child clinics and paediatric services and during any sporting and cultural activities that are held on these premises. This may provide one way of defining a</p>	All food companies should be encouraged to use the official PHE logo in order to ensure consistency and increase recognition among consumers. There are concerns that consumers will not be able to distinguish between different logos, and any differences in criteria which may underpin these.

	<p>range of foods marketed and promoted to children.</p> <p>In addition, as suggested by other professional groups, the Ofcom criteria for restricting high fat, sugar and salt foods (HFSS) from being marketed to children under 16 on TV programmes where children make a large proportion of the audience could be used to identify products that could carry the logo. In the case of the 5 A Day logo, we suggest adopting the green 'Front of Pack' nutrition labelling criteria for fat, salt and sugar as a way around this challenge.</p> <p><b>Purees</b></p> <p>Any portion of fruit and vegetables made from purees within foods should be limited to a maximum of one portion, regardless of how much is provided in a composite product. This includes in all fruit juices/smoothies. Many of the benefits of fruit and vegetables such as their bulking role in the diet, and the displacement of HFSS foods when they are consumed, are lost when foods are pureed.</p> <p>No fruit and/or vegetable puree marketed for infants and young children should be allowed to carry a 5 A Day logo.</p> <p><b>Salt criteria</b></p> <p>Only products that meet the green Front of Pack (FOP) nutrition labelling salt thresholds AND 2017 salt reduction targets should be eligible for the 5 A Day logo, in order to ensure consistency across government in terms of its public health policy.</p>	
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		<p><b>Sugar criteria</b> The logo should be restricted to products coded green on the FOP nutrition labelling criteria.</p> <p>We support the exclusion of extruded products such as fruit bars, fruit leathers or other similar dried fruit and vegetable products, due to dental health and energy density concerns. There is no evidence that these products are beneficial to public health.</p> <p><b>Fat criteria</b> Should be restricted to products colour coded green on the FOP nutrition labelling criteria.</p> <p><b>Adding up F&amp;V components from multiple ingredients to count as a portion</b> We do not support this approach. Many of the health benefits associated with fruit and vegetable consumption in research has only considered fruit and vegetables that have been counted in surveys as those products themselves. The additional small amounts of fruit and vegetable within other dishes would not have been included in intakes of fruit and vegetables in epidemiological studies. This therefore potentially 'double counts' intakes.</p>	
Voluntary sector	23	<p><b>Use of 5 a day logo on composite foods</b> Very concerned about the possibility that the 5 A Day logo could be used on composite (processed) foods. Cannot see that this will add any benefit to the public eating more healthily, but rather will add confusion as to what constitutes</p>	

	<p>healthy food. Feel it is likely that consumers will interpret the 5 A Day logo as a health claim on composite foods, which would blur the two aims of promoting more consumption of fresh fruit and vegetables, and promoting a healthy diet, and could end up doing neither.</p> <p>Feel that the potential negative impact would be compounded by the 'just eat more' strapline which accompanies the logo in much of its usage, and may be appropriate in promoting fruit and vegetables, but for composite foods especially those which are high in salt, sugar and/or fat would mislead consumers and be counterproductive to the original aims of such public health campaigns.</p> <p>Concern that fatty, salty and sugary processed foods could be promoted as if they are a healthy contribution to the 5 A Day target. This is based on experience that in 2002, several mainstream food manufacturers and supermarkets were already marketing highly questionable processed foods in this way, before the Department of Health's 5 A Day logo had become established, and before composite foods had been excluded from its licensing criteria.</p> <p>An investigation by the UK Food Commission throughout 2001 and 2002 found, for example, high-salt children's processed foods carrying 5 A Day claims; over-claiming of portions; and large price premiums on basic foods carrying the 5 A Day message, in comparison to ordinary unlabelled 5 A Day products. The Food Commission concluded, and</p>	
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	<p>we continue to believe to be the case, that if the five a day message is allowed on composite foods, then:</p> <ul style="list-style-type: none"><li>• composite foods that contain lots of other ingredients that aren't part of the five a day message (eg fat, salt, sugar), but that do contain some fruit or vegetables, will be promoted as part of a healthy diet – confusing the health message</li><li>• five a day will be used as a value-added brand, on premium-priced foods</li><li>• the five a day message will rarely be promoted in association with non-value added foods, such as loose, unprocessed fruit and vegetables</li><li>• fruit imagery and descriptions will appear on food labels of products that do not offer the same health benefits as real fruit</li><li>• health benefits of a product containing fruit or vegetables will be exaggerated</li><li>• manufacturers of snacks will add fruit juice as a minor ingredient to their products, but describe this on the label in a way to make their sugary, fatty or salty products seem healthier</li></ul> <p><b>5 A Day message</b> Through 5 A Day or other nutritional guidance from PHE or from government – such as the Eatwell plate – the message to the public should be clear that most of their 5 A Day should come from unprocessed fruit and vegetables.</p>	
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		<p><b>Children</b> If the 5 A Day logo on composite foods was to be agreed on, then any processed products aimed at children should be excluded from bearing the logo.</p>	
Voluntary sector	24	<p><b>Use of 5 a day logo on composite foods</b> Response as per 23. In addition:</p> <p><b>Nutrition criteria</b> Feel the logo should only be applied to only those composite foods that meet the green Front of Pack nutrition guidelines and the 2017 salt targets, in order to ensure consistency across government in terms of its public health policy.</p>	
Voluntary sector	25	<p><b>Use of 5 a day logo on composite foods</b> Response as per 24. In addition:</p> <p><b>Extruded fruit products</b> Extruded fruit products should be excluded from carrying the 5 A Day logo because these products are high in extrinsic free sugars, stick to the teeth, and are primarily promoted as in-between meal snacks, all of which are bad for dental health.</p> <p><b>Fruit juice</b> Fruit juice should also be excluded from carrying the 5 A Day logo because it is high in free sugars and has been associated with increased risk of weight gain and type 2 diabetes.</p>	

Voluntary sector	26	<p><b>Use of 5 a day logo on composite foods</b></p> <p>Concerned about the potential use of the 5 A Day logo on composite, processed foods. Using this logo on these products could lead to overconsumption of products which are high in sugar, salt and fat and contribute towards obesity. Suggested further testing is needed to ensure that expanding this to composite products does not mislead the public about the healthiness of products high in sugar, salt and fat.</p> <p>Feel there is a risk of a substitution effect between products currently with the 5 A Day logo such as fresh and frozen fruit and vegetables, towards composite, processed foods. This means not only would there be no net gain in fruit and vegetable consumption, but potentially a public health loss due to overconsumption of sugar, salt and fat.</p> <p>Any expansion of the use of 5 A Day to composite, processed products should be based on evidence to demonstrate positive changes to people's diets.</p> <p><b>Nutrition criteria</b></p> <p>The use of the 5 A Day logo should not be applied to products which under the Food Standards Agency nutrient profiling system are deemed unhealthy.</p>	<p>Support the 5 A Day messaging and welcomes Public Health England's work to ensure that the impact of this campaign is maximised. Eating a diet rich in fruit and vegetables is important for reducing the risk of cancer. A lack of fruit and vegetables is associated with 15,100 cases of cancer a year in the UK.</p>
Voluntary	27	<p><b>Use of 5 a day logo on composite foods</b></p> <p>Concerned at the proposal to extend the 5 A Day logo to composite foods.</p>	

	<p>The combined fruit and vegetable market in the UK was worth over £15 billion in 2013 [Mintel. Fruit and vegetables UK 2013. <a href="http://store.mintel.com/fruit-and-vegetables-uk-october-2013">http://store.mintel.com/fruit-and-vegetables-uk-october-2013</a>]. This huge market which combines fresh, frozen, canned and dried fruit and vegetables is already eligible to carry the 5 A Day logo under the existing rules of the government scheme.</p> <p>Over the years, the 5 A Day logo and ‘just eat more’ strapline has promoted the message that these natural, whole foods can be eaten in unlimited quantities. Such a message would not be appropriate for composite foods such as main meals and snacks which are high in fat, salt and/or sugar, and would only serve to confuse consumers.</p> <p>The overarching message for consumers should be that most of their 5 A Day should come from non-processed fruit and vegetables. This should accompany messaging from PHE in their social marketing campaigns such as Change4life.</p> <p><b>Nutrition criteria</b></p> <p>Consumers are likely to interpret the 5 A Day logo as a health claim on composite foods. Therefore, if the rules are to be relaxed we recommend that only food products meeting colour-coded green colour for salt, fat and sugar in the government’s FOP nutrition labelling scheme should be eligible to carry the 5 A Day logo in order to support consistency across government policy on nutrition.</p>	
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	<p>We strongly recommend use of the 5 A Day logo should not be extended to composite foods, because:</p> <ol style="list-style-type: none"> <li>1. It would undermine public health messages on healthy diets (promulgated by PHE, the Department of Health and other groups over the last decade)</li> <li>2. The impact and potential unintended consequences on consumers could be large, eg the logo might inadvertently lead to reductions in consumption of whole fruit and vegetables by consumers</li> <li>3. The fruit and vegetables included in composite foods might be significantly different from those already being purchased by consumers – even less fibre, vitamins and nutrients and more sugars?</li> </ol>	
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